

Exhibit 61

SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT)
ADDICTION/PERSONAL INJURY) MDL No.
PRODUCTS LIABILITY LITIGATION) 4:22-md-3047-YGR
-----)

THIS DOCUMENT RELATES TO:)

BOARD OF EDUCATION OF HARFORD)
COUNTY V. META PLATFORMS INC.,)
ET AL.)

CASE NO.: 4:23-CV-03065)

VIDEOTAPED DEPOSITION BERNARD HENNIGAN
Harford County Public Schools Central
Administration Building
102 South Hickory Avenue,
Bell Air, Maryland
Wednesday, May 7, 2025, 2:21 p.m.

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P R O C E E D I N G S

* * *

THE VIDEOGRAPHER: We are now on the record.

My name is Bradley Loy. I'm a videographer for Golkow, a Veritext division.

Today's date is May 7th, 2025. The time is 1421.

This video deposition is being held in Bel Air, Maryland, in the matter of Social Media Adolescent Addiction/Personal Injury Products Litigation for the U.S. District Court, Northern District of California.

The deponent is Bernard Hennigan.

Counsel will be noted on the stenographic record.

The court reporter is Cindy Hayden and will now swear in the witness.

* * *

BERNARD HENNIGAN,
having been first duly sworn, was examined and testified as follows:

* * *

EXAMINATION

BY MR. KEYES:

1 Q. Good afternoon, Mr. Hennigan. We've
2 met before. But for the record, my name is Andrew
3 Keyes. I'm an attorney with the law firm of
4 Williams & Connolly, and we represent the Google
5 and YouTube defendants.

6 Well, would you please state your full
7 name for the record?

8 A. Bernard Paul Hennigan.

9 Q. And do you understand that you are
10 still under oath?

11 A. Yes.

12 Q. Do you understand that you are still
13 under oath and giving testimony as if you were in a
14 courtroom before a judge and a jury?

15 A. Yes.

16 Q. Have you ever given a deposition before
17 today?

18 A. No.

19 Q. Have you ever given testimony under
20 oath before today?

21 A. Yes.

22 Q. How many times?

23 A. Many.

24 Q. In what setting or settings?

25 A. As a pupil personnel worker in

1 Baltimore County Public Schools, I would charge
2 parents with failure to send child to school and
3 have to represent the district in court for those
4 cases.

5 Q. How many times did you do that?

6 A. Hundreds.

7 Q. Separate from those occasions where you
8 testified in a court as a pupil personnel worker,
9 have there been other circumstances where you've
10 testified under oath?

11 A. I don't think so.

12 Q. I took your deposition earlier today as
13 Harford County Public Schools' corporate
14 representative on a number of topics.

15 And you told me that to prepare for
16 that deposition, you met with counsel three times
17 for roughly three hours and you reviewed three
18 documents: the complaint, the list of topics for
19 which you were the designated corporate
20 representative and an interrogatory answer.

21 I understand you reviewed that before
22 today. Did you review anything else to prepare for
23 your deposition as a fact witness, where you're
24 testifying as Mr. Hennigan as opposed to testifying
25 as Harford County Public Schools?

1 A. No.

2 Q. Have you ever asked any of the
3 defendants in this case to modify any feature or
4 function of any of their platforms?

5 A. Me personally?

6 Q. Yes.

7 MR. BYRD: Object to form.

8 You can answer.

9 THE WITNESS: No.

10 BY MR. KEYES:

11 Q. Have you asked anyone else to do so?

12 A. No.

13 Q. Have you ever asked any of the
14 defendants to discontinue any of the features or
15 functions of their platforms?

16 A. No.

17 Q. Have you asked anyone else to do so?

18 A. No.

19 Q. Have you ever spoken with any
20 representative of any of the defendants about any
21 of their features or functions on their platforms?

22 A. No.

23 Q. Have you ever spoken with any
24 representative of any of the defendants about
25 anything?

1 A. I don't believe so.

2 (HENNIGAN EXHIBIT 1, Resume of Bernard
3 Hennigan, was marked for identification.)

4 BY MR. KEYES:

5 Q. I'm showing you what has been marked as
6 Hennigan Exhibit 1. What is this?

7 A. It looks like my resume.

8 Q. Is this something you prepared?

9 A. Yes.

10 Q. When did you last update it?

11 A. Well, based on the title change, it
12 would have been within the last month. My current
13 title has recently changed.

14 Q. Your current title is assistant
15 superintendent of student support services?

16 A. Yeah. It -- it's just -- just because
17 I said earlier I was the executive director, it's
18 kind of weird. I don't even know if this is in
19 effect now or till July 1st. But I think this is
20 official.

21 We've had a reorganization. Our --
22 nothing has changed about my job or my pay. Just
23 the title.

24 Q. Okay.

25 A. But we had a -- we did a whole

1 reorganization, and some positions are, quote,
2 unquote, effective. So I think this is my current
3 title.

4 Q. You've been employed by Harford County
5 Public Schools since January of 2017?

6 A. Yes, sir.

7 Q. And your first position was as the
8 executive director of student services?

9 A. The director of student services?

10 Q. I'm sorry. The director of student
11 services?

12 A. Yes. And then --

13 Q. And then you became the executive
14 director of student support services?

15 A. Correct.

16 Q. And then, at some point, you became the
17 assistant superintendent of student support
18 services; is that right?

19 A. Yes. I think it's official now.

20 Q. When you got the new title assistant
21 superintendent of student support services, did you
22 get any added responsibilities compared to the
23 responsibilities you had with the prior title?

24 A. No.

25 Q. When you got the title of executive

1 director of student support services back in
2 July of 2019, did you get any added
3 responsibilities compared to the responsibilities
4 you had when you were the director of student
5 services?

6 A. Yes.

7 Q. And what was the difference, then, in
8 responsibilities?

9 A. So as a director of student services, I
10 oversaw our student services department, which is
11 our counselors, nurses, psychologists, PPWs, social
12 workers.

13 When I became the executive director,
14 Title I and special education came under my purview
15 and then, eventually, community schools.

16 Q. When you were the director of student
17 services, to whom did you report?

18 A. The superintendent. No. Sorry. When
19 I first started here, I reported to the executive
20 director of ed services.

21 Q. Who was that when you first --

22 A. Joe Schmitz.

23 Q. And did you report to him throughout
24 the time you were the director of student services?

25 A. Yes.

1 Q. When you became the executive director
2 of student support services, who did you report to?

3 A. The superintendent.

4 Q. And do you still report to the
5 superintendent as an assistant superintendent of
6 student support services?

7 A. Yes. For the time being.

8 Q. Do you anticipate that changing?

9 A. I believe July 1st part of the
10 reorganization is I will report to a deputy
11 superintendent.

12 Q. Who will that be?

13 A. Dyann Mack, Dr. Dyann Mack.

14 Q. And what position will she have?

15 A. The deputy superintendent.

16 Q. What will be within her portfolio as
17 deputy superintendent?

18 A. She will oversee my office, the office
19 of education services and the office of curriculum.
20 I don't think that's official until July 1st.

21 Q. Have you ever worked as a teacher in
22 Harford County Public Schools?

23 A. No.

24 Q. Have you ever been an assistant
25 principal in Harford County Public Schools?

1 A. No.

2 Q. Have you ever been a principal in
3 Harford County Public Schools?

4 A. No.

5 Q. Have you ever worked in the IT
6 department of the Harford County Public Schools?

7 A. No.

8 Q. Have you ever worked in the finance or
9 budget departments of Harford County Public
10 Schools?

11 A. No.

12 Q. Your resume shows that you have a
13 bachelor's of science in secondary education in
14 English?

15 A. Yes.

16 Q. From Towson University?

17 A. Correct.

18 Q. And you have a master's of education in
19 school counseling from the Loyola College of
20 Maryland?

21 A. Yes.

22 Q. Do you have any other professional
23 degrees?

24 A. Degrees, no.

25 Q. Okay. You do have certifications?

1 A. Yes. And I'm also a licensed clinical
2 professional counselor.

3 Q. Okay. And I believe that's listed here
4 as one of your certifications.

5 A. Yeah. Oh, yes. Okay.

6 Q. Okay. When did you first become a
7 licensed clinical professional counselor?

8 A. I believe that was in 2010.

9 Q. And where were you licensed?

10 A. In Maryland.

11 Q. Have you kept that license active since
12 2010?

13 A. Yes.

14 Q. Do you have continuing education
15 requirements in order to keep your license in good
16 standing?

17 A. Yes. 40 hours every two years.

18 Q. And have you fulfilled those continuing
19 education requirements such that you've kept your
20 license in good standing?

21 A. Yes.

22 Q. Do you have a license to be a clinical
23 professional counselor anywhere outside Maryland?

24 A. No.

25 Q. You list a number of certifications on

1 your resume. Do you have any certifications that
2 aren't listed here?

3 A. I don't believe so.

4 Q. And what entity or entities give these
5 certifications?

6 A. So the Superintendent -- it's not --
7 well, Superintendent endorsement is just a matter
8 of classes. There wasn't a specific track that I
9 went. I just have what I need to qualify for that.
10 So I received that endorsement by virtue of the
11 classes I took.

12 The Supervisor of Pupil Personnel is
13 through Maryland State Department of Education.
14 The same with Administrator I. Same with Pupil
15 Personnel Worker. Same with Professional School
16 Counselor.

17 Certified Youth Mental Health First Aid
18 Instructor is through the Mental Health First Aid
19 organization.

20 Q. Did you get any degree in psychology?

21 A. No.

22 Q. Did you get any degree in psychiatry?

23 A. No.

24 Q. Have you ever practiced as a
25 psychologist?

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1 A. As a LCPC, but not as a psychologist.

2 Q. Okay. So have you ever practiced as a
3 psychologist?

4 A. No.

5 Q. Have you ever practiced as a
6 psychiatrist?

7 A. No.

8 Q. Have you ever worked as a clinical
9 professional counselor or a licensed clinical
10 professional counselor in Harford County Public
11 Schools?

12 A. Oh, for the school system? No.

13 Q. When you say "for the school system,"
14 you -- you have not worked as a licensed clinical
15 professional counselor in Harford County Public
16 Schools, correct?

17 A. Correct. It's not really a position we
18 have.

19 Q. Have you worked as a licensed clinical
20 professional counselor in any other school
21 district?

22 A. No.

23 Q. Have you ever practiced as a licensed
24 clinical professional counselor outside a school
25 district?

1 A. Yes.

2 Q. When was the last time you did that?

3 A. I currently do.

4 Q. And tell me about how you have a
5 practice as a licensed clinical professional
6 counselor outside Harford County Public Schools?

7 A. So 2010 I started working with an
8 organization, the Human Development Center, as a
9 practicing LCPC, and then eventually went out on my
10 own, and then eventually opened my own practice,
11 which I still operate today.

12 Q. For how long did you serve as a
13 licensed clinical professional counselor with the
14 Human Development Center? From 2010 until when?

15 A. I stopped when I came here. So until
16 2017.

17 Q. And did you see clients then through
18 the Human Development Center?

19 A. Yes.

20 Q. Was the Human Development Center a
21 nonprofit organization or a for-profit entity?

22 A. For profit.

23 Q. And was that a full-time job or a
24 part-time job?

25 A. Part-time.

1 Q. And so for each year from 2010 to 2017,
2 roughly how many patients or clients did you see?

3 A. It might be easier to say hours per
4 week than people. I worked about 15, 20 hours a
5 week.

6 Q. Okay. And if you worked 15 to 20 hours
7 per week, roughly how many patients or clients
8 would you see during -- during a week?

9 A. I was running groups at the time, so --
10 actually, let me rephrase that, because I was
11 probably getting 15 to 20 billable hours. So I was
12 probably seeing 15 to 20 people a week, but some of
13 that was in groups. So one hour may have been five
14 children.

15 Q. And what was the age range of the
16 patients or clients you were seeing through the
17 Human Development Center?

18 A. I would say roughly probably from
19 8 years old to adults in their 40s.

20 Q. Are you able to give me an estimate of
21 how many clients or patients you saw per year
22 during your time at Human Development Center?

23 A. Different, you mean?

24 Q. Different.

25 A. 30 maybe would be an estimate.

1 Q. Okay. And -- and of the 30 or so
2 patients you saw per year through the Human
3 Development Center, what percentage were adults?

4 A. Probably 15 percent, 10 percent.

5 Q. 10 to 15 percent?

6 A. Yes.

7 Q. And what percentage were teens?

8 A. 80 percent. 75 percent, let me say.

9 Q. And what percentage were preteens?

10 A. The other 10 to 15.

11 Q. What prompted you to move from the
12 Human Development Center to starting your own
13 practice?

14 A. I was approached by another therapist
15 in town who did not see children, and she was
16 seeing a patient who told her that I was doing good
17 work with her child. And so she asked if someone
18 were to ask her to see children, could she refer
19 them to me, at which time she said that I could see
20 them in her office, and she wouldn't charge me,
21 which means I could keep the full amount of money.
22 Because currently, at the Human Development Center,
23 I was only keeping a partial amount of the money.

24 So I began to work in her office. And
25 then eventually she moved to Virginia, at which

1 time I kept the office and opened my own practice.

2 Q. When did she move to Virginia and you
3 opened your own practice?

4 A. Probably around 2017, possibly. 2015,
5 maybe.

6 Q. So did you work as a licensed clinical
7 professional counselor in her office for a year or
8 under a year?

9 A. 2010 -- I would say two years.

10 Q. And does your practice have a name?

11 A. Guided Wellness Counseling.

12 Q. Are there other clinicians in your
13 practice?

14 A. No.

15 Q. Has it always just been you as the only
16 clinician in Guided Wellness Counseling?

17 A. Yes.

18 Q. And from the time you started the
19 practice in 2017 until the present, roughly how
20 many patients do you see each year through
21 Guided Wellness Counseling?

22 A. Currently, now? Because --

23 Q. Well, we can start currently.

24 A. -- it's drastically changed. I would
25 say five.

1 Q. Five patients per year?

2 A. Yes.

3 Q. And how was that number per year in
4 prior years?

5 A. Probably closer to 10. 10 or 12.

6 Q. And for the years when you had 10 to 12
7 patients per year, what percentage of them were
8 adults?

9 A. 80 percent, 90 percent.

10 Q. What percentage were teens?

11 A. 10 percent.

12 Q. And what percentage were preteens?

13 A. None.

14 Q. Okay. And then when it changed to
15 around five patients a year, what is the breakdown
16 of those roughly five patients across adults, teens
17 or preteens?

18 A. All adults.

19 Q. All adults?

20 So when was the last time you had a
21 preteen who was a client when you worked as a
22 licensed clinical professional counselor?

23 A. I would say over four years ago. I
24 couldn't be specific, though.

25 Q. And when was the last time you had a

1 teen who was a client when you worked as a licensed
2 clinical professional counselor?

3 A. Probably a year -- probably two years
4 ago.

5 Q. Have you practiced as a licensed
6 clinical professional counselor anywhere outside
7 the Human Development Center and Guided Wellness
8 Counseling?

9 A. No.

10 Q. When you were at the Human Development
11 Center, you said you were running groups. Did you
12 also see clients on an individual basis?

13 A. I did.

14 Q. So of the 30 patients or so you saw per
15 year, how many did you see on an individual basis?

16 A. I would say probably about half, 15.

17 Q. So roughly 15 patients you saw in
18 groups and roughly 15 you saw on an individual
19 basis?

20 A. Roughly, yeah.

21 Q. Okay. Have you run groups during your
22 time at Guided Wellness Counseling?

23 A. Yes.

24 Q. And so during the time when you had 10
25 to 12 patients per year, how many of those did you

1 see on an individual basis?

2 A. I'd say about four -- oh, about eight
3 individual, four group -- four in group.

4 Q. And during the time when you've had
5 roughly five patients a year, how many of those did
6 you see on an individual basis?

7 A. All individual.

8 Q. So -- okay.

9 A. I haven't done groups in years.

10 Q. When was the last time you ran a group
11 or did counseling as a licensed clinical
12 professional counselor in a group setting?

13 A. Maybe 2018.

14 Q. Have you ever worked as a counselor of
15 any sort in Harford County Public Schools?

16 A. No.

17 Q. You were asked earlier about a
18 presentation you heard from Leonard Sax?

19 A. Yes.

20 Q. Do you recall those questions from
21 plaintiff's counsel?

22 A. Yes.

23 Q. How many times did you hear a
24 presentation from Mr. Sax?

25 MR. BYRD: Object to form. It was in a

1 prior depo. But, yes.

2 THE WITNESS: I saw it in person once,
3 and I remember watching it again in video form
4 maybe one other time.

5 BY MR. KEYES:

6 Q. Was it the same presentation?

7 A. Yes.

8 Q. So you saw it once in person and later
9 you watched a recording of it?

10 A. Yes.

11 Q. And when did you see the presentation
12 in person?

13 A. I honestly don't recall.

14 Q. When did you see the video of the
15 presentation?

16 A. I honestly don't recall. It was soon
17 after.

18 Q. Who is Leonard Sax?

19 A. I believe he's a psychologist.

20 Q. And what was his presentation on?

21 A. The negative impacts of social media
22 and video games on children.

23 Q. Did he have any handouts that he gave
24 to participants or attendees?

25 A. I don't recall.

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1 Q. Did he have a slide deck that he used?

2 A. Yes.

3 Q. Did you follow up with Leonard Sax
4 after the presentation and speak with him?

5 A. No.

6 Q. Did you ever follow up with Leonard
7 Sax?

8 A. No.

9 Q. Have you ever had any communications
10 with Leonard Sax other than attending his
11 presentation?

12 A. Not that I recall.

13 Q. Are you able to estimate for me when
14 you saw the presentation? Was it two years ago?
15 Five years ago? Ten years ago?

16 A. I would say 2019 would be best guess.

17 Q. And how did his presentation come to
18 your attention?

19 A. It was advertised through -- I believe
20 it was our office of mental health in Harford
21 County.

22 Q. Who went with you to see the
23 presentation?

24 A. I believe my daughter -- my oldest
25 daughter and wife at the time. Well, my oldest

1 daughter and wife.

2 Q. How -- how old was your daughter at the
3 time she went with you to see Leonard Sax'
4 presentation?

5 A. She would have been about 14.

6 Q. Is that an 8th grader? 9th grader?

7 A. She was -- she's older because of her
8 birthday. Probably 7th or 8th grade.

9 Q. Do you use YouTube?

10 A. Sometimes.

11 Q. Do you have a YouTube account?

12 A. I may. I tried to share a video, as I
13 said earlier, of a celebration we did for one of
14 our staff members with everybody who was there, and
15 the link was too big.

16 And so I think somehow I was taken to
17 some ability to create it on YouTube, and then I
18 shared it.

19 So I -- I think I may have, but that
20 would be -- that would be the only time I actually
21 had an account. So I -- I may currently have one.
22 I don't know how that works.

23 Q. When was the last time that you used
24 YouTube?

25 A. I don't know.

1 Q. Well, how often have you used it in the
2 last six months?

3 MR. BYRD: Object to form.

4 THE WITNESS: I don't know. Five, ten
5 times.

6 BY MR. KEYES:

7 Q. When you've used YouTube, in what
8 context?

9 A. Sometimes I'll use it for music.
10 Sometimes I'll use it for DIY information. That's
11 typically.

12 Q. "DIY," "do-it-yourself"?

13 A. Yeah.

14 Q. Okay. Do you have a Facebook account?

15 A. I do not.

16 Q. Do you have an Instagram account?

17 A. I do not.

18 Q. Do you have a TikTok account?

19 A. I do.

20 Q. You do?

21 A. Well, I have the app. I don't know if
22 that means I have an account.

23 Q. Okay.

24 A. I'm not sure if you automatically have
25 an account by default.

1 Q. Do you have a Snapchat account?

2 A. I do not.

3 Q. For how long have you had a TikTok app?

4 A. I had it and then I got rid of it, and
5 then I got it again. I don't remember when.
6 Probably four or five months ago.

7 Q. You got it again four to five months
8 ago?

9 A. Yes.

10 Q. Why?

11 A. I was getting videos sent to me that I
12 couldn't see. And then -- so I downloaded it to
13 see a video that someone sent me, and then I just
14 kept it.

15 Q. You said you had it, you got rid of it,
16 then you got it again?

17 A. Uh-huh.

18 Q. When you got rid it, why did you get
19 rid of it?

20 A. It was Lent, so I was using that as my
21 reason to get off of it. It was causing problems
22 with me just getting sucked into it and not being
23 able to get off it. So I used Lent as the catalyst
24 to get off it and stayed off it for about a year.

25 Q. You said "Lent," L-E-N-T?

1 A. Uh-huh.

2 Q. The season before Easter?

3 A. Yes.

4 Q. Okay. When -- during the period when
5 you had TikTok, how often have you used it?

6 A. When I had it or now?

7 Q. Well, let's start with -- you got it
8 again four to five months ago?

9 A. Yeah.

10 Q. Since then, how often do you use it?

11 A. I probably look at it once every other
12 day.

13 Q. And during your first stint, before you
14 got rid of it during Lent, how often did you use
15 it?

16 A. Daily.

17 Q. Have you ever posted anything to
18 Harford County Public Schools' YouTube channel?

19 A. I was in a video that was posted, but
20 I -- I never posted personally.

21 Q. Have you posted any content to Harford
22 County Public Schools' Facebook or Instagram
23 accounts?

24 A. No.

25 Q. You testified earlier you have three

1 daughters?

2 A. Yes.

3 Q. And are they at middle school age or
4 above?

5 A. 7th, 8th and a freshman in college.

6 Q. So is it the freshman in college who
7 went with you to the Leonard Sax presentation?

8 A. Correct.

9 Q. Does your 7th grade daughter have a
10 YouTube account?

11 A. Not to my knowledge.

12 Q. Does she have a Facebook account?

13 A. Not to my knowledge.

14 Q. How about an Instagram account?

15 A. Not to my knowledge.

16 Q. How about a TikTok account?

17 A. Not to my knowledge.

18 Q. How about a Snapchat account?

19 A. Not to my knowledge.

20 Q. How about your 8th grade daughter?
21 Does she have a YouTube account?

22 A. Not to my knowledge.

23 Q. Does she have a Facebook, Instagram,
24 TikTok or Snapchat account?

25 A. Not to my knowledge.

1 Q. Have -- have your 7th grade or
2 8th grade daughters asked you for any of those
3 accounts?

4 MR. BYRD: Object to the form.
5 Relevance.

6 But go ahead.

7 THE WITNESS: Yes. Regularly.

8 BY MR. KEYES:

9 Q. And have you said no?

10 A. Yes.

11 Q. Your oldest daughter, who's a freshman
12 in college, has she ever had a YouTube account?

13 A. I don't know.

14 Q. Has -- did she ever have a YouTube
15 account when she was in high school or middle
16 school?

17 A. I don't know. I don't think so.

18 Q. Did she ever have a Facebook,
19 Instagram, TikTok or Snapchat account when she was
20 in high school or in middle school?

21 A. She may -- I think -- yeah. She had a
22 Snapchat account in high school -- later high
23 school years.

24 Q. When she was in high school, did she
25 have a Facebook, Instagram or TikTok account?

1 A. She took herself off Snapchat and moved
2 to Facebook on her own. I think that may have been
3 her senior year of high school. And I think she
4 currently has a TikTok account.

5 Q. When she was in middle school, did she
6 have any Facebook, Instagram, TikTok or Snapchat
7 accounts?

8 A. No.

9 Q. Did she have a YouTube account in
10 middle school?

11 A. No, not to my knowledge.

12 Q. Did she get the Snapchat account in her
13 senior year of high school with your permission?

14 A. I believe it was maybe junior year, and
15 yes.

16 Q. When she had a Snapchat account in her
17 junior year and senior years of high school, did
18 you impose any limits on her use of Snapchat?

19 A. Sort of. There was limits on access
20 because the phone was charged in our bedroom, so
21 she didn't have access to it at night.

22 And I had an app, which I can't
23 remember the name of now, which sort of monitored
24 the activity on her phone.

25 Q. Was that an app that was part of the

1 phone, or is this a separate app?

2 A. Separate. A separate app that I
3 purchased.

4 Q. And that allowed you to set limits on
5 her use of Snapchat?

6 A. No.

7 Q. Or the phone in general?

8 A. It would alert me if there was
9 problematic content.

10 Q. So it was like a content filter for her
11 phone?

12 A. Not a filter. It would just tell me --
13 well, maybe it filtered it. I don't know. But I
14 would get an alert if there was, you know, nudity
15 or explicit language or something.

16 Q. Okay. So in her junior and senior year
17 of high school, your daughter had a Snapchat
18 account. You imposed limits on her access to her
19 cell phone by requiring her to charge it in your
20 bedroom at night.

21 Were there other limits on when she
22 could access the phone before she checked it in for
23 the night, either time of day or the amount of
24 time?

25 A. I feel like at some point we had

1 time -- time constraints on it. But it, frankly,
2 wasn't an issue that we needed to deal with with
3 her. She wasn't succumbing to, really -- by it as
4 much as the younger two are now.

5 Q. And then separate from any time limits,
6 you -- you downloaded an app that would monitor the
7 content on her cell phone and alert you?

8 A. Correct.

9 Q. Were there any --

10 A. And my wife.

11 Q. Sorry. What?

12 A. And my wife.

13 Q. Okay. Were there any other limits or
14 controls that you used for her use of her cell
15 phone when she was a junior or a senior in high
16 school?

17 MR. BYRD: Object to form.

18 THE WITNESS: I mean, I think what
19 might fall under the word "control" is me looking
20 through her phone regularly to see, you know, what
21 the activity was in there.

22 BY MR. KEYES:

23 Q. Anything else that you would view as a
24 limit or a control regarding her access to or her
25 use of her cell phone when she was a junior or

1 senior in high school?

2 A. Well, it definitely has become the best
3 consequence for a child.

4 Q. I'm not sure I follow. When you say,
5 "it definitely has become the best" --

6 A. So removing the phone because of some
7 other poor behavior --

8 Q. Okay.

9 A. -- instead of --

10 Q. You confiscated the phone at some
11 point?

12 A. Yes.

13 Q. For some period of time?

14 A. Yes.

15 Q. Did you at some point restore it?

16 A. Yes.

17 Q. That was independent of the phone
18 itself; that was a consequence for some other
19 behavior?

20 A. Sure. Yeah.

21 Q. Okay. Were there other controls that
22 you were aware of that you elected not to use, such
23 as controls on the device itself?

24 A. I don't know if "elected." I don't
25 know that I was as savvy back then as to what we

1 could or could not do. So we -- we didn't impose
2 any, but there may have been something that we
3 didn't know about.

4 Q. Okay. When you say "back then," she's
5 a freshman in college, right?

6 A. (Nods head.)

7 Q. Yes?

8 A. Yeah.

9 Q. And we're talking about her junior and
10 senior year, assuming a year or two ago?

11 A. Yeah. I guess I'm kind of thinking the
12 full complement of when she had her phone. So I
13 guess the answer is no.

14 Q. Okay. Were there other limits you
15 imposed on her access to or use of her phone before
16 she was a junior?

17 A. The same. Charging it in our room,
18 having the app on it to regulate content.

19 Q. When did she get a cell phone?

20 A. I believe it was 7th grade.

21 Q. When did your 8th grade daughter get a
22 cell phone?

23 A. I think that was middle of her 6th
24 grade year.

25 Q. And when did your 7th grade daughter

1 get a cell phone?

2 A. I think that's about the same, middle
3 of 6th grade year.

4 Q. Okay. So for your 7th grade daughter
5 and your 8th grade daughter, they each got a cell
6 phone at some point during their 6th grade year,
7 yes?

8 A. For my youngest two?

9 Q. Yes.

10 A. Yes.

11 Q. And then for your oldest, she got her
12 cell phone sometime in 7th grade?

13 A. If I recall correctly, yes.

14 Q. And you've described for me the
15 controls you had in place or the limits you had in
16 place for your oldest daughter. Are those the same
17 controls or limits you put in place on your
18 7th grade and 8th grade daughters' use of their
19 cell phones?

20 A. No. So we do -- we still don't allow
21 for it to be charged in their rooms, but I do not
22 any longer use the app to monitor the activity.

23 Q. Why did you stop using the app to
24 monitor activity?

25 A. I didn't find it to be incredibly

1 useful. I would see things on their phone that
2 didn't come through on the app, so it was -- I felt
3 like I was paying for something that only gave
4 me -- that gave me inadequate data.

5 Q. Did you explore other apps to either
6 block or monitor content on any of your daughters'
7 phones?

8 A. Yes. So, currently, my 8th grade
9 daughter, which this is perplexing to me, but she
10 needs to get me to sign into the -- I guess it's
11 called the Apple cloud and put my password in to
12 approve her getting an app. But for some
13 confounding reason, I can't get that same to sync
14 with my 7th grade daughter, so... I'm trying.

15 Q. If the 8th grader wants to download an
16 app, she needs to go through you and get your
17 permission?

18 A. I get an alert. I have to put a
19 password in and approve it.

20 Q. But for some reason, it doesn't apply
21 to your 7th grader's phone?

22 A. Yeah. I just keep trying to figure it
23 out, and I'm not smart enough to figure out why.

24 Q. So then you periodically check your
25 7th grade daughter's phone on your own to see what

1 apps are on there?

2 A. Both, yeah.

3 Q. Okay. Middle school kids use their
4 phones for all sorts of reasons, correct?

5 A. Correct.

6 MR. BYRD: Object to form.

7 BY MR. KEYES:

8 Q. I know you've said before students use
9 social media apps. Besides the defendants'
10 platforms, are you aware of other social media apps
11 that students use on their phones?

12 A. I don't know if Minecraft is considered
13 an app. Did you say "app"? Social media --

14 Q. I said social media apps.

15 A. Yeah, I don't know if Minecraft is
16 considered social media. That seems to be a big
17 one, but I don't know if that's more of a game.

18 Q. Okay. Are you able to identify any
19 other social media apps that students use on their
20 cell phones?

21 MR. BYRD: Object to form.

22 THE WITNESS: Where is that list? Oh,
23 here it is. Not offhand. I can't think of any
24 that aren't listed.

25 MR. BYRD: I'm sorry. What are you

1 referring to?

2 THE WITNESS: Oh, sorry. Under the
3 "Online Media & Communications Services"
4 definition.

5 BY MR. KEYES:

6 Q. Okay. So are you on Exhibit 2?

7 A. Sorry. Yes. Exhibit 2, Page 6.

8 Q. Definition 3?

9 A. Yes.

10 Q. Okay. So the defendants as you flagged
11 before are Facebook, Instagram, Snapchat, TikTok
12 and YouTube, which are on this list. Do you see
13 that?

14 A. Okay. Yeah.

15 Q. What other social media platforms do
16 students use on their cell phones?

17 A. I feel like the other ones in this list
18 are probably a full complement of that. BeReal,
19 Discord, GroupMe, Kik, Omegle, Pinterest, Reddit,
20 Twitch, Tumblr, WhatsApp, Twitter and Yik Yak.

21 Q. And then you mention students also use
22 Minecraft on their phones?

23 A. That's a game. I don't know if it's
24 necessarily social media.

25 Q. Right. I wasn't asking about social

1 media. I just -- you mentioned students also use
2 Minecraft on their phones?

3 A. Correct.

4 MR. BYRD: Object to form.

5 Yeah, you did mention social media.
6 That was your question, but okay.

7 BY MR. KEYES:

8 Q. What other video games do students use
9 on their cell phones?

10 MR. BYRD: Object to form.

11 And, also, just to be clear, he's only
12 speaking in his individual capacity here, and I
13 don't know what students you're talking about.

14 MR. KEYES: Students in general. And
15 you're right.

16 BY MR. KEYES:

17 Q. You're just testifying as Mr. Hennigan.

18 But based on your experience and your
19 interactions, what other video games besides
20 Minecraft do students use on their cell phones?

21 A. I've seen them play a pool game when
22 they're playing pool against each other. I can't
23 think of any other games I've seen them play.

24 Q. Fortnite?

25 MR. BYRD: Object to form.

1 THE WITNESS: I suppose that's a thing,
2 yeah. I don't -- they don't play that as far as I
3 know, but --

4 BY MR. KEYES:

5 Q. Clash of Clans?

6 A. Never heard of that.

7 Q. Brawl Stars?

8 A. Never heard of that. You must have
9 boys.

10 Q. I have four kids. Three boys, one
11 girl.

12 Do kids also use their cell phones to
13 listen to music?

14 A. Absolutely.

15 MR. BYRD: Object to form.

16 BY MR. KEYES:

17 Q. And do they use Spotify?

18 MR. BYRD: Objection.

19 THE WITNESS: Some do.

20 BY MR. KEYES:

21 Q. What other services have you seen
22 students use to listen to music on their cell
23 phones?

24 A. YouTube, Pandora, Apple Music.

25 Q. What else?

1 A. That's all I can think of.

2 Q. And do students also use their cell
3 phones to access sports apps like ESPN?

4 MR. BYRD: Objection. Foundation.

5 THE WITNESS: Yes, I suppose.

6 BY MR. KEYES:

7 Q. Well, have you seen students who use
8 their phones to access ESPN?

9 MR. BYRD: Objection.

10 THE WITNESS: I haven't.

11 BY MR. KEYES:

12 Q. Have you seen --

13 MR. KEYES: What's the objection?

14 MR. BYRD: Well, he's testified that
15 they don't have phones -- there's phones that are
16 not out in school. So I don't -- I don't know
17 about the time -- timing of when you're talking
18 about. And I don't know -- when you say
19 "students," are you talking about students outside
20 Harford, his own kids who could also be students?

21 He's testified that, you know, there
22 was a new school policy or whatever, so I don't
23 know about the foundation of being able to see
24 stuff within the school.

25 BY MR. KEYES:

1 Q. Have you --

2 MR. BYRD: I have a lot of objections.

3 BY MR. KEYES:

4 Q. Have you seen Harford County Public
5 Schools' students use their phones to access ESPN
6 or any sports app?

7 A. No.

8 Q. Do students use their cell phones to --
9 to watch content on streaming services like
10 Netflix?

11 MR. BYRD: Same objection --

12 THE WITNESS: Yes.

13 BY MR. KEYES:

14 Q. Are you able to identify --

15 MR. BYRD: -- as to time.

16 Hold on.

17 -- as to time. Vague.

18 BY MR. KEYES:

19 Q. Are you able to identify for me any
20 streaming services that students use their cell
21 phones to watch besides Netflix?

22 MR. BYRD: Same objection.

23 THE WITNESS: Hulu.

24 BY MR. KEYES:

25 Q. What else?

1 A. Disney+.

2 Q. What else?

3 A. YouTube TV. That's all I can think of.

4 Q. And in your observations, do students
5 also use their cell phones to text each other?

6 MR. BYRD: Objection. Vague as to
7 time.

8 THE WITNESS: Yes.

9 BY MR. KEYES:

10 Q. Are you able to identify for me other
11 ways that students use their cell phones in your
12 experience?

13 You've listed social media. You've
14 listed video games. You've listed music platforms.
15 You've listed streaming services. And you've
16 listed texting.

17 Any other ways that, in your experience
18 and your observation, Harford County Public
19 Schools' students have used their cell phones?

20 MR. BYRD: Objection.

21 THE WITNESS: Yeah. I mean, when I
22 think about when I look at my daughters' phones,
23 the first place I go is the -- is the camera app
24 and to see the pictures that they're taking of
25 themselves and of other people.

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1 And I think that's probably one of the
2 most widely used app on their phone is the camera.

3 BY MR. KEYES:

4 Q. And are you referring to a particular
5 camera app?

6 A. No, just the standard -- well, I always
7 assume everyone has an iPhone. The standard iPhone
8 camera app.

9 Q. Okay. So you're referring to the
10 camera itself in the phone?

11 A. Correct.

12 Q. Okay.

13 A. Taking pictures of themselves and
14 others.

15 Q. And then are you -- have you seen
16 students in Harford County Public Schools not only
17 take the pictures but then transmit them to other
18 people?

19 A. Yes.

20 MR. BYRD: Object to form.

21 BY MR. KEYES:

22 Q. In your experience, how do they do
23 that? What platform or platforms do they use?

24 A. Social media, typically.

25 Q. Are there other ways they also transmit

1 photos?

2 A. Through WhatsApp or text messaging.

3 Q. Are there any other ways that, in your
4 experience and your observations, students have
5 transmitted photos on their cell phones?

6 A. Other than social media apps or
7 texting?

8 Q. Other -- other than social media apps,
9 WhatsApp and text messaging?

10 A. They show it to people directly.

11 Q. Any other ways?

12 A. They have -- they can screenshot it and
13 show it during a FaceTime phone call.

14 Q. Any other ways?

15 A. Not that I can think of.

16 (HENNIGAN EXHIBIT 2, Plaintiff Board of
17 Education of Harford County's Amended Objections
18 and Responses to Defendants' Interrogatories
19 (Set 3), was marked for identification.)

20 BY MR. KEYES:

21 Q. Let me show you what has been marked as
22 Hennigan Exhibit 2. This is titled "Plaintiff
23 Board of Education of Harford County's Amended
24 Objections and Responses to Defendants'
25 Interrogatories (Set 3)."

1 MR. BYRD: And, again, you had an
2 opportunity to ask about this in the 30(b)(6). So,
3 just to be clear, you're asking him only in his
4 individual capacity.

5 And, you know, to the extent you try to
6 use this in a 30(b)(6) use down the road, that will
7 be impermissible and we'll object to that.

8 BY MR. KEYES:

9 Q. Have you seen -- have you seen Hennigan
10 Exhibit 2 before?

11 A. I have.

12 Q. Did you review it in your prep sessions
13 with the lawyers?

14 A. Not necessarily the whole exhibit, but
15 the category of damages chart.

16 Q. Are you referring to the chart on
17 Page 3?

18 A. Yes.

19 Q. That continues onto Page 4?

20 A. Yes.

21 Q. So did you see that chart in your prep
22 sessions with the lawyers?

23 A. Yes.

24 Q. Had you seen that chart before your
25 prep sessions with the lawyers?

1 A. Yes.

2 Q. When did you first see that chart?

3 A. In an email. I was asked to --

4 MR. BYRD: Yeah, and hold on.

5 If -- if -- to the extent that those
6 were emails from lawyers or with lawyers on it
7 directing you to do stuff, then don't discuss that.

8 If you -- if you say you've seen it
9 before, I think that's enough. But don't discuss
10 anything that was discussed with the lawyers.

11 BY MR. KEYES:

12 Q. My question was just: When?

13 A. Yeah.

14 Q. When did you first see the chart in
15 terms of time?

16 A. I don't know. I'd say within the last
17 three months.

18 Q. That was the first time you saw the
19 chart?

20 A. (Nods head.)

21 Q. Is that a "yes"?

22 A. Yes.

23 Q. Okay. There is also an Attachment A in
24 this document. And Attachment A actually has two
25 worksheets. The first one is titled

1 "Program/Department Worksheet."

2 Do you see that?

3 A. Yes.

4 Q. Have you seen that worksheet before?

5 A. Yes.

6 Q. Did you review that worksheet with the
7 lawyers in the prep sessions?

8 A. Yes.

9 Q. Had you seen that worksheet before your
10 prep sessions with the lawyers?

11 A. Yes.

12 Q. When did you first see this worksheet?

13 A. At the same time, about three months
14 ago.

15 Q. Okay.

16 A. Within the last three months.

17 Q. And then there's a second chart called
18 a Full-Time Equivalent Worksheet.

19 Do you see that?

20 A. Yes.

21 Q. Have you seen that worksheet before?

22 A. Yes.

23 Q. Did you review that worksheet with the
24 lawyers in the prep sessions?

25 A. Yes.

1 Q. And had you seen that worksheet before
2 your prep sessions with the lawyers?

3 A. I'm not sure.

4 Q. When did you first see this worksheet?

5 A. Either at the same time I saw the other
6 one or just yesterday.

7 Q. Okay. Did you have any role in the
8 preparation of the full-time equivalent worksheet?

9 MR. BYRD: Well, object to form.

10 You can answer what contributions you
11 had, but just don't disclose any conversations with
12 counsel.

13 THE WITNESS: I did not. But I
14 contributed to the program/department worksheet.

15 BY MR. KEYES:

16 Q. Okay. What role did you play in the
17 preparation of the program/department worksheet?

18 A. I provided percentages for the
19 psychological services as well as the school
20 counseling services.

21 Q. Did you play any role in -- in deciding
22 what department/programs to list on the worksheet?

23 A. I don't recall. I don't believe so.

24 Q. Did you provide any of the weight
25 percentages for any of the other departments or

1 programs listed here besides psychological services
2 and school counseling services?

3 A. I may have been a part of the pupil
4 personnel services, but I don't recall specifically
5 if I left that to Mr. Williams.

6 Q. Who is Mr. Williams?

7 A. He is the supervisor of the pupil
8 personnel services.

9 Q. Does he report to you?

10 A. Yes.

11 Q. For how long has he reported to you?

12 A. Since I got here in January of '17.

13 Q. Do you have any recollection of
14 speaking with Mr. Williams about pupil personnel
15 services and a weight percentage?

16 A. I don't.

17 Q. Did you have a conversation with anyone
18 else, including Buzz Williams, about any weight
19 percentage for any of the other departments or
20 programs besides psychological services and school
21 counseling services?

22 A. No.

23 Q. Did anyone work with you to prepare the
24 5 percent weight that is listed here for
25 psychological services?

1 MR. BYRD: Object to form.

2 Wait. Hold on. Okay. Yeah.

3 Obviously, you can answer that to the
4 extent that it does not include your conversations
5 with counsel or the work product directed by
6 counsel.

7 You can answer it.

8 THE WITNESS: I don't believe so.

9 BY MR. KEYES:

10 Q. Did anyone work with you to prepare the
11 10 percent weight that is listed here for school
12 counseling services?

13 MR. BYRD: Same instruction. Just
14 don't disclose any communications or direction of
15 counsel. But you can answer that otherwise.

16 THE WITNESS: I don't believe so.

17 BY MR. KEYES:

18 Q. Okay. Why -- why did you choose a
19 5 percent weight for the psychological services
20 department or program?

21 A. So --

22 MR. BYRD: Same objection.

23 But go ahead.

24 THE WITNESS: Sure.

25 When I look at the role of a school

1 psychologist and the amount of time they spend in
2 the various activities they're doing, I then begin
3 to think about how often those activities would
4 involve issues concerning social media and their
5 impacts, and determined that, based on all the
6 other activities that they would be doing outside
7 of that, there would be a -- 5 percent of their
8 time dedicated or involving issues concerning
9 social media.

10 BY MR. KEYES:

11 Q. You believe that 5 percent of the time
12 of people in the psychological services department
13 or program is spent on issues concerning social
14 media?

15 A. Correct.

16 Q. Why did you choose a 10 percent weight
17 for the school counseling services department or
18 program?

19 A. For the same reason. But our school
20 counselors have a lot more face time with students
21 and get involved at a -- well, our school
22 counselors deal with all the students in the
23 building, whereas psychological services do not.

24 So school counseling staff has more
25 face time with students during the day but also

1 have face time with all students, not just a select
2 group.

3 Q. So did you estimate that 10 percent of
4 the staff who work in the school counseling
5 services department or program spend 10 percent of
6 their issues -- spend 10 percent of their time on
7 issues concerning social media?

8 A. No. I concluded that all school
9 counseling services spend 10 percent of their time.

10 Q. Fair enough.

11 Did you estimate that the staff who
12 worked in the school counseling services department
13 or program spent 10 percent of their time on issues
14 concerning social media?

15 A. Yes.

16 Q. So, first, for psychological services,
17 what did you look at, if anything, to arrive at
18 that 5 percent estimate they spend 5 percent of
19 their time on issues concerning social media?

20 MR. BYRD: Objection.

21 Again, only in your individual
22 capacity. Go ahead.

23 THE WITNESS: So I took into account
24 the number of students that they would be working
25 with, the amount of time they would be involved in

1 testing, the amount of time they would be involved
2 in meetings with families, the amount of time they
3 would be involved in crisis response coupled with
4 the amount of those issues which then tie back to
5 issues concerning phones and social media and
6 arrived at 5 percent of their time being dedicated
7 to dealing with issues that were impacted by social
8 media.

9 BY MR. KEYES:

10 Q. Did you look at any documents when you
11 arrived at the 5 percent weight?

12 A. I believe I looked at our special
13 education data because they're primarily working
14 with special education students. I don't recall if
15 I had availability to look at testing data.

16 Q. And did you -- were you finished?

17 A. Yes.

18 Q. Did you speak with any nonlawyers about
19 what information or factors to consider in
20 assigning this 5 percent weight to psychological
21 services?

22 A. I don't recall if I consulted with
23 Mr. Richards or not. I'm, frankly, not sure.

24 Q. Okay. Same questions for the
25 10 percent weight on school counseling services.

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1 What did you consider in arriving at that weight?

2 A. So taking into account the caseloads of
3 our counselors, that they're working with anywhere
4 from three to five hundred students each and also
5 taking into account the number of students that
6 they're meeting with daily, the number of groups
7 they're running, the number of classroom sessions
8 they're doing based on social media and responsible
9 use in addition to their response to crisis
10 concerns that would be drawn back to social media
11 and then arrived at that 10 percent of their time
12 being impacted by the social media concerns.

13 Q. Did you look at any documents when you
14 arrived at this 10 percent weight?

15 MR. BYRD: Object to form.

16 You can answer that literally, I guess.

17 THE WITNESS: I believe I remember
18 looking at our wellness needs assessment data to
19 get some -- some data regarding what our students
20 are reporting as far as social media and phone use
21 and sleep and things of this nature, which then end
22 up on the school counselors' doorstep with --
23 impacting students in several different ways.

24 BY MR. KEYES:

25 Q. Did you speak with any nonlawyers about

1 what information or factors to consider in
2 assigning this 10 percent weight to school
3 counseling services?

4 A. I don't think in this instance I did
5 consult with the supervisor. I don't believe I
6 did.

7 Q. Did you consult with anyone else?

8 A. I don't believe so.

9 Q. For the 5 percent weight that you
10 assigned to psychological services, when you say
11 that you believe that 5 percent of their time is
12 spent on issues concerning social media, would that
13 include work that they spend with students dealing
14 with the consequences of cyberbullying?

15 A. For -- for psychological services, it
16 wouldn't be necessarily directly linked to the
17 bullying, but indirectly. So things that may have
18 occurred as a result of the bullying that then
19 required the psychologist to meet with the student,
20 whether that be risk assessment, suicide ideation
21 report, threat assessment, IEP, counseling as a
22 related service, things of that nature.

23 So not directly because they were
24 bullied, but because of things that occurred
25 because they were bullied, if that makes sense.

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1 Q. Let me make sure I understand. So when
2 you're looking at staff in the psychological
3 services department and you're concluding that they
4 spend 5 percent of their time on issues concerning
5 social media, that 5 percent includes time that
6 they spent helping the student with things that
7 were the result of the bullying?

8 A. Correct.

9 Q. Does that 5 percent also include time
10 they spent helping the student with things that are
11 the result of fighting that was publicized on
12 social media?

13 A. For the psychologist, probably not.

14 Q. What about for the school counseling
15 services?

16 A. There's higher potential there, but
17 less so this year because there hasn't been as much
18 of that.

19 Q. Does the 5 percent for psychological
20 services include time that's spent -- staff spent
21 helping the student with mental health issues
22 attributable to content they watched, including on
23 social media?

24 MR. BYRD: Object to form.

25 THE WITNESS: Indirectly, yes.

1 BY MR. KEYES:

2 Q. Does the 10 percent for school
3 counseling services include time that that staff
4 spent helping students with -- who have mental
5 health issues that are attributable to content they
6 watched, including on social media?

7 A. Yes.

8 Q. Can you give me some other examples of
9 what the psychological services staff were spending
10 their time on when they were spending time on what
11 you say are issues concerning social media?

12 A. So you could have students who are not
13 performing well academically because of social
14 media, because they're not getting the proper
15 sleep, because they are feeling depressed based on
16 their interactions on there.

17 They could also be students who are
18 dysregulated, and they are seen in a counseling
19 capacity or in a testing capacity or in a crisis
20 capacity. And that dysregulation being a result
21 of, in some cases, things that they've seen, done,
22 posted, been posted about them on social media.

23 Q. Okay. And is the same true for what
24 the school counseling services staff were spending
25 their time on when they were spending time on what

1 you say are issues concerning social media?

2 A. It would be more so for the school
3 counseling staff because they have a more -- a
4 closer relationship with students that they see on
5 a regular basis. Again, they're also seeing every
6 student and not just some students like the
7 psychologists see.

8 In addition to that, they're running
9 groups which have content that is sometimes
10 indirectly the result of social media; in addition
11 to, they oftentimes are a link between the student
12 and the parent, so parents reporting to them
13 concerns they have with their child's sleep, mood,
14 overall mental health that they would like the
15 counselor to look into.

16 So the counselor tends to be more the
17 frontline staff and the psychologist more of the
18 higher-incident staff.

19 Q. You referenced the school counseling
20 staff running groups which have content that is
21 sometimes indirectly the result of social media.
22 What content are you referring to?

23 A. So some of our school counselors are
24 running groups for children with poor self-esteem,
25 for children who are suffering with anxiety and

1 depression, for children who have had issues with
2 self-harm, with issues struggling with their own
3 sexuality.

4 And these are all things that have
5 just -- we've seen in recent years been exacerbated
6 by social media, which has then caused us to --
7 like I said, I think, earlier today, my staff and
8 my department has exponentially grown because of
9 that.

10 Q. And for these children you referenced
11 who have poor self-esteem, who are suffering with
12 anxiety and self-harm, who are struggling with
13 their own sexuality, you attribute that at least
14 indirectly to social media because of what the
15 children are -- are seeing or posting on social
16 media?

17 A. Not everyone, but in -- in part, yeah.

18 Q. But some of the children who have poor
19 self-esteem, who are suffering with anxiety and
20 depression, who have had issues with self-harm are
21 experiencing those issues with no connection to
22 social media --

23 MR. BYRD: Object to form.

24 BY MR. KEYES:

25 Q. -- right?

1 MR. BYRD: Object to form.

2 THE WITNESS: Correct.

3 BY MR. KEYES:

4 Q. Okay. For the ones where they -- they
5 are, in your view, experiencing poor self-esteem or
6 suffering with anxiety and depression or who have
7 issues with self-harm or struggling with their
8 sexuality because of social media, is that because
9 of what they're -- they're seeing, what messages
10 they're receiving, and -- and what they're posting
11 on social media?

12 A. In addition to what's being posted
13 about them.

14 Q. Okay. Thank you.

15 A. We had the most extreme case. We've
16 had children kill themselves because someone posted
17 pictures about them on social media.

18 MR. KEYES: Off the record?

19 MR. BYRD: Yeah.

20 THE VIDEOGRAPHER: Stand by.

21 MR. KEYES: Take a break?

22 MR. BYRD: Yeah.

23 THE VIDEOGRAPHER: We are off the
24 record at 1527.

25 * * *

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1 (Whereupon, there was a recess in the
2 proceedings from 3:27 p.m. to 3:50 p.m.)

3 * * *

4 THE VIDEOGRAPHER: We are on the record
5 at 1550.

6 (HENNIGAN EXHIBIT 3, 2021-2022 Maryland
7 YRBS/YTS Adverse Childhood Experiences Overview,
8 July 17, 2023, was marked for identification.)

9 BY MR. KEYES:

10 Q. Mr. Hennigan, I'm showing you what has
11 been marked as Hennigan Exhibit 3. This is a
12 document that was produced by the Maryland
13 Department of Health with the Bates Number
14 F12936-000065843.

15 MR. BYRD: I don't see any Bates
16 numbers on here, but you're -- that's --

17 MR. KEYES: It was produced in native.

18 MR. BYRD: -- probably a native file.

19 BY MR. KEYES:

20 Q. Have you seen this document before,
21 Mr. Hennigan?

22 A. I don't know. I'm not sure.

23 Q. Do you know what it is?

24 MR. BYRD: Well, objection.

25 Take your time and look at it if you

1 don't know what it is.

2 THE WITNESS: I mean, it seems like the
3 results of YRBS and ACEs and youth tobacco survey
4 data from '21-'22.

5 BY MR. KEYES:

6 Q. "YRBS" stands for "Youth Risk
7 Behavioral Survey"?

8 A. Yes.

9 Q. "YTS" stands for "Youth Tobacco
10 Survey"?

11 A. Yes.

12 Q. And are you aware that the Maryland
13 Department of Health conducts a periodic youth risk
14 behavioral survey?

15 A. Yes.

16 Q. And does that survey include students
17 in Harford County Public Schools?

18 A. Periodically, yes.

19 Q. Are there any documents that reflect
20 how particular Harford County Public Schools are
21 selected for participation in the youth risk
22 behavioral survey?

23 A. I'm pretty sure we find out from them
24 and it's at random.

25 Q. Do they randomly choose the grades?

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1 A. They definitely randomly choose the
2 schools. I'm not sure about the grades.

3 Q. And then who administers the survey
4 within Harford County Public Schools that are
5 selected?

6 MR. BYRD: Objection. Foundation.

7 THE WITNESS: I'm not sure. I'm
8 assuming it probably happens in the classroom with
9 teachers, but it could be administered by --
10 actually, I think -- yeah. It either happens in a
11 general classroom or in a health classroom.

12 BY MR. KEYES:

13 Q. And how often does the department of
14 health conduct this youth risk behavioral survey?

15 A. I don't know. I'm not sure if it's
16 annually or not. I feel like it's not annually,
17 like, maybe more like biannually, but...

18 Q. When the results of this survey are
19 released, do they send you or anyone else in
20 Harford County Public Schools a summary of what the
21 survey shows?

22 MR. BYRD: Objection. Foundation.

23 You can answer as it relates to you or
24 what you know.

25 THE WITNESS: I've received copies in

1 the past. I don't know who from, but I'm assuming
2 it's from them or from MSDE.

3 BY MR. KEYES:

4 Q. And do you understand this to be a
5 survey of Maryland students', including Harford
6 County students', experiences with ACEs or --

7 MR. BYRD: Object.

8 BY MR. KEYES:

9 Q. -- adverse childhood experiences?

10 MR. BYRD: Sorry. Object to form.
11 Foundation as to which students.

12 THE WITNESS: It appears as though they
13 do, yes.

14 BY MR. KEYES:

15 Q. Okay. And does this report also show
16 that the more ACEs a student experiences, the
17 greater the risk of poor health outcomes for them?

18 MR. BYRD: Object to form and
19 foundation.

20 THE WITNESS: Yes.

21 BY MR. KEYES:

22 Q. And do those poor health outcomes
23 include both physical, mental and emotional health?

24 A. Yes.

25 Q. Can you turn to Slide 14?

1 A. Yes.

2 Q. Are you on Slide 14? It's titled
3 "Emotional Abuse"?

4 A. Yes.

5 Q. And then in parentheses it says
6 "(MAP)," M-A-P.

7 Do you know what "MAP" stands for?

8 A. I don't.

9 Q. And this slide says that in 2021-2022,
10 12.1 percent of students exposed to emotional
11 abuse.

12 Do you see that?

13 A. Yes.

14 Q. Emotional abuse or exposure to
15 emotional abuse is an ACE, correct?

16 A. Abuse in general. So I'm assuming
17 emotional would be a part of that.

18 Q. And this chart also shows that
19 12.3 percent of high school students in Harford
20 County are exposed to emotional abuse.

21 Do you see that?

22 A. Correct.

23 Q. Do you have any reason to challenge
24 that 12.3 percent of high school students in
25 Harford County are exposed to emotional abuse?

1 MR. BYRD: Object to form. Foundation.
2 Hypothetical. He didn't put this together.

3 But you can answer if you know.

4 THE WITNESS: Personally, because I'm
5 speaking from my own personal perspective, I would
6 challenge it, yes.

7 BY MR. KEYES:

8 Q. Why would you challenge it or on what
9 basis?

10 A. Because I think the stigma is so great
11 that some children, even though it's anonymous,
12 would feel uncomfortable answering in the
13 affirmative to that question.

14 Q. So do you think the 12.3 percent
15 understates the percentage of high school students
16 who are exposed to emotional abuse?

17 A. I do.

18 Q. Do you have a basis for offering what
19 you think is the correct higher percentage of high
20 school students who are exposed to emotional abuse
21 in Harford County?

22 A. No. It's just a inclination on my
23 part. I don't have an exact response to that.

24 Q. Would you turn to Slide 16? Are you
25 there?

1 A. Yes.

2 Q. And this slide says that in 2021-2022,
3 25.3 percent of students were exposed to substance
4 abuse.

5 Do you see that?

6 A. Yes.

7 Q. And exposure to substance use in the
8 household is another ACE, adverse childhood
9 experience?

10 A. Yes.

11 Q. And this chart also shows that
12 27.9 percent of high school students in Harford
13 County were exposed to substance use in the
14 household, correct?

15 A. Yes.

16 Q. Do you believe that that percentage is
17 underreporting the problem of high school students
18 in Harford County being exposed to substance use in
19 the household?

20 A. I think that's hard to say.

21 Q. Do --

22 A. I think -- unless they've defined a
23 "problem drinker," a student could think that
24 their -- their parent having any alcohol makes them
25 a problem drinker. So they may answer in the

1 affirmative to that.

2 So it's -- it's hard to say how kids
3 are interpreting the term "problem drinker."

4 The other ones pretty -- seem pretty
5 clear.

6 So I might say, "Yeah, my parent is a
7 problem drinker," but maybe, by definition, they're
8 not.

9 Q. Do you have any reason to identify a
10 different percentage for high school students in
11 Harford County who are exposed to substance use in
12 the household?

13 MR. BYRD: Object to form. Asked and
14 answered.

15 THE WITNESS: I don't know what that
16 difference would be. I just know it's hard to say
17 if this is accurate or not.

18 BY MR. KEYES:

19 Q. Would you turn to Slide 18?

20 Are you there?

21 A. Yes.

22 Q. This slide says that in 2021 to 2022,
23 33.5 percent of students were exposed to mental
24 illness in the household.

25 Do you see that?

1 A. Yes.

2 Q. And exposure to mental illness in the
3 household is another ACE, adverse childhood
4 experience?

5 A. Yes.

6 Q. This chart shows that 38.7 percent of
7 high school students in Harford County were exposed
8 to mental illness in the household, correct?

9 A. Yes.

10 Q. Do you believe that that percentage is
11 underreporting the problem of high school students
12 in Harford County being exposed to mental illness
13 in the household?

14 A. Underreporting, no.

15 Q. Okay. Do you have a reason to identify
16 a different percentage for high school students in
17 Harford County who are exposed to mental illness in
18 the household?

19 MR. BYRD: Object to form. Foundation.

20 THE WITNESS: I, again, think this is a
21 hard one to really get a clear answer on,
22 especially when we're dealing with adolescents who
23 often are at odds with their parents and may think
24 they're, quote, unquote, crazy because of their
25 philosophy on things.

1 And so how a teenager views their
2 parent being mentally ill or -- I mean, suicidal is
3 pretty clear-cut.

4 But I think a lot of teenagers think
5 their parents are way off base. And so then would
6 they put that in the category of mentally ill?
7 It's hard to say.

8 So I -- I just -- you know, I don't
9 know if these surveys really spell out what these
10 words mean for kids.

11 So when you're sitting in class and you
12 want to get this over with, you might just check
13 "yes" because you had a fight with your mom that
14 morning and you think she's crazy.

15 And so -- because 38.7 percent seems
16 extremely high to me of households with a mentally
17 ill, depressed or suicidal parent in the home.

18 But it could be accurate. I just --
19 it's -- I would -- I'd have to see whether they've
20 truly defined these words for the kids who are
21 taking the survey.

22 BY MR. KEYES:

23 Q. Would you turn to Slide 20. Are you
24 there?

25 A. Yes.

1 Q. This slide says that in 2021-2022,
2 14.8 percent of students were exposed to household
3 incarceration. Do you see that?

4 A. Yes.

5 Q. And having someone in the household
6 incarcerated is another ACE, adverse childhood
7 experience?

8 A. Yes.

9 Q. Yes?

10 A. Yes.

11 Q. This chart shows that 16.4 percent of
12 high school students in Harford County were exposed
13 to household incarceration, correct?

14 A. Yes.

15 Q. Do you have any reason to believe that
16 number is underreporting the problem?

17 MR. BYRD: Object to form. Foundation.

18 THE WITNESS: Underreporting? No.

19 BY MR. KEYES:

20 Q. Do you have a reason to identify a
21 different percentage for high school students in
22 Harford County who are exposed to incarceration of
23 someone in the household?

24 MR. BYRD: Objection.

25 THE WITNESS: This is a much more

1 concrete question. So I don't think there would be
2 any issues with definition here. I only think
3 there could be issues with, again, the stigma
4 associated with it and people not answering in the
5 affirmative because they're embarrassed by it.
6 Even though we know no one else is going to see it,
7 some people don't believe that.

8 So the other only piece about this that
9 I have had concerns with the YRBS in general is,
10 are kids just going through and answering quickly
11 to get it over with, so...

12 But as far as definitionwise, this is
13 pretty clear on what they're asking, so...

14 BY MR. KEYES:

15 Q. Would you turn to Slide 26. This slide
16 shows the relationship between the number of ACEs
17 reported by students and the percentage of the time
18 they claim their mental health is either most of
19 the time or always not good, correct?

20 A. 26?

21 Q. Yes, sir.

22 A. Oh, you're looking on the right. I'm
23 sorry. I was looking at the physical fights.

24 Q. Sure. Do you want me to repeat the
25 question?

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1 A. No. So one of the charts -- I'm not --
2 I just -- I just saw these two as well.

3 "Mental health most of the time/always
4 not good." That's an odd way to phrase that.
5 Yeah, so it's showing that the more ACEs you have,
6 the poorer mental health you have.

7 Q. And here, it reports that for students
8 in the survey who reported zero adverse childhood
9 experiences, 17.7 percent of them said their mental
10 health is not good most of the time or always?

11 A. Correct.

12 Q. And it also reports that for students
13 in the survey who reported more than four adverse
14 childhood experiences, 70.8 percent of them said
15 their mental health is not good most of the time or
16 always?

17 MR. BYRD: Object to form.

18 THE WITNESS: Correct.

19 MR. BYRD: Foundation.

20 BY MR. KEYES:

21 Q. Is that consistent with your training
22 and experience about the relationship between the
23 number of adverse childhood experiences a student
24 has and how they view their mental health?

25 MR. BYRD: Object to form. Foundation.

1 THE WITNESS: Yes.

2 BY MR. KEYES:

3 Q. The more adverse childhood experiences
4 a student experiences, the worse their mental
5 health is, in general?

6 A. Not necessarily. The higher the
7 likelihood, because on the next page, which you'll
8 see is what we talked about this morning of
9 positive childhood experiences, which research has
10 shown that -- this is a little off topic. But
11 research has shown that the absence of the positive
12 is actually more detrimental than the presence of
13 the negative.

14 And the same researcher shows that
15 students with four or more ACEs, the more of the
16 positive that they have, it dramatically drops
17 that.

18 So you could take a child with zero
19 ACEs and a child with four ACEs; the child with
20 four ACEs has all seven of these PCEs, and they
21 have a much better mental state than a child with
22 zero ACEs but none of these PCEs.

23 Q. The positive childhood experiences can
24 reduce or negate the effect of --

25 A. Absolutely.

1 Q. -- adverse childhood experiences?

2 A. Yes. So you have to kind of look at
3 both -- the whole picture of the child.

4 Q. And this is also sort of
5 child-specific?

6 A. Absolutely, yeah. Resilience is the
7 big factor. So for those of you with kids, ask
8 your children these seven questions.

9 Q. Will do.

10 How many school psychologists does
11 Harford County Public Schools employ now?

12 A. Roughly, I think somewhere in the
13 neighborhood of 43 plus 3 or 4 -- 4 interns.

14 Q. And how many school psychologists did
15 Harford County Public Schools employ in the
16 2016-2017 school year?

17 A. '16-'17? That's the year I got here?
18 I would say mid-30s.

19 Q. And does Harford County Public Schools
20 employ counselors?

21 A. Correct.

22 Q. How many counselors does it employ now?

23 A. Approximately 110.

24 Q. How many counselors did it employ in
25 the 2016-2017 school year?

1 A. I would say approximately 100.

2 Q. Does Harford County Public Schools
3 employ other people besides school psychologists
4 and counselors to provide counseling or mental
5 health treatment?

6 A. Yes.

7 Q. What are those positions?

8 A. Social workers.

9 Q. Any other positions?

10 A. Pupil personnel workers.

11 Q. Okay. Any others?

12 A. Behavior coaches.

13 Q. Any others?

14 A. To some degree, nurses. I'm going
15 through -- going through the offices in my suite.

16 Social workers, psychologists,
17 counselors, nurses, behavior coaches, pupil
18 personnel workers.

19 And you said that -- I'm sorry. What's
20 the -- what's the -- they're -- what are they
21 providing?

22 Q. Counseling or mental health treatment.

23 A. We have one LCPC. We have two LCPCs.
24 Sorry. And this is just that we employ?

25 Q. Yes.

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1 A. I think that's it.

2 Q. Okay. So how many social workers does
3 Harford County Public Schools employ now?

4 A. Approximately 20.

5 Q. And how many did it employ back in the
6 2016-2017 school year?

7 A. Probably seven.

8 Q. How many behavior coaches does Harford
9 County Public Schools employ now?

10 A. Approximately 20.

11 Q. And how many did it employ in 2016-2017
12 school year?

13 A. Zero.

14 Q. How many pupil personnel workers does
15 Harford County Public Schools employ now?

16 A. I would say 15.

17 Q. How many did it employ in the 2016-2017
18 school year?

19 MR. BYRD: Object to form. Foundation.

20 THE WITNESS: Seven, I believe. Seven
21 or eight.

22 BY MR. KEYES:

23 Q. And did Harford County Public Schools
24 have licensed clinical professional counselors in
25 the 2016-2017 school year?

1 A. No.

2 Q. How many nurses does Harford County
3 Public Schools employ now?

4 A. I would say roughly 62.

5 Q. How many did it employ in the 2016-2017
6 school year?

7 A. That has not grown as high. I don't
8 know. Say 57, roughly.

9 Q. And what are the counseling or mental
10 health services that nurses provide to students?

11 A. So some of them provide help with
12 students, mostly with anxiety, because students
13 will present to them with physical ailments that
14 they are sometimes able to determine aren't
15 really -- well, they're somatic complaints that
16 they know aren't related to anything physical but
17 more mental health related.

18 Some participate in something called
19 the Calm Study, which I think is an acronym that
20 helps work with students with anxiety. But that's
21 the primary -- primary role, that, and it's not
22 really therapy, but providing medication to address
23 those issues.

24 Q. Does the federal government provide
25 funding for any of these positions?

1 A. The -- I think one social worker is on
2 our Title I grant, which is federal dollars, not
3 the PPWs, not the psychs' nurses. I think just one
4 social worker as of today. The LC -- one of the
5 LCPCs until this year.

6 Q. One of the LCPCs was funded with
7 federal --

8 A. Title I, yeah.

9 Q. Title I, until this year?

10 A. Yeah. We moved it.

11 Q. And you moved it to what?

12 A. Medical assistance funding, which I'm
13 not sure if that's federal or state.

14 Q. For -- for psychologists, was there a
15 steady increase in the number of psychologists from
16 2016-2017 school year to now?

17 A. Yes. I think we went to two interns.
18 Then we went to four, went to six, back down to
19 four. So that's been sort of up and down. I don't
20 know that we had a large growth year. It's sort of
21 been a steady growth to reduce caseloads based on
22 the duties that are becoming unmanageable with the
23 caseloads they have.

24 Q. Was there a big jump in the need for
25 school psychologists during or after COVID?

1 A. I don't think we grew any more
2 post-COVID than we did from '16 to '20. At a great
3 of a rate, rather.

4 Q. COVID had a negative effect on
5 students' mental health, correct?

6 A. Well, again, as we talked about this
7 morning, "COVID" is a very ambiguous term. I mean,
8 people say "COVID," but there's a lot of detail
9 wrapped up in that.

10 So I guess, generally speaking, all the
11 things that happened during COVID impacted
12 children.

13 Q. Well, let's try to unpack it. There
14 was a fear of the health consequences of COVID,
15 correct?

16 MR. BYRD: Object to form.

17 THE WITNESS: For some, yeah.

18 BY MR. KEYES:

19 Q. Some people were afraid of getting
20 COVID. Yes?

21 A. Of course.

22 Q. Getting sick and possibly dying. Yes?

23 A. Yeah.

24 Q. Some people were afraid of loved ones
25 getting sick and possibly dying. Yes?

1 A. Yes.

2 Q. So in that sense, do you agree that the
3 COVID pandemic was a stressor on students' mental
4 health?

5 MR. BYRD: Object to form.

6 THE WITNESS: Yes.

7 BY MR. KEYES:

8 Q. You've said before that one of the
9 issues during COVID was undetected abuse in the
10 home, correct?

11 A. Correct.

12 Q. That before COVID and after COVID, if
13 students were coming into school, there would be
14 more oversight. People could see the warning
15 signs, maybe report the abuse and try to tackle the
16 abuse. Is that fair?

17 A. Correct.

18 Q. But during COVID, when people weren't
19 coming into school, they were at home and it was
20 easier for that abuse to go undetected.

21 A. Correct.

22 Q. Yes?

23 A. Correct.

24 Q. So do you agree that for students who
25 were exposed to abuse -- they were either abused or

1 there was abuse going on around them in the home
2 that was undetected -- that was a stressor on
3 students' mental health?

4 A. Well, again, when I -- when I talk
5 about those reports, it's not just abuse. It's
6 abuse and neglect. And I think we need to talk
7 about them equally.

8 Because I think part of it was the
9 physical, sexual, emotional abuse that was
10 occurring, but also some of it was the neglect that
11 was occurring.

12 You had babies who are now in our
13 classrooms being born into a world where they
14 weren't being paid attention to because the parents
15 were engaged on their phones or computers or
16 tablets working and not able to do the typical
17 childrearing or get them to a day care to get the
18 typical childrearing.

19 So it's really, probably, equal parts
20 of abuse and neglect.

21 Q. I should expand my question.

22 Do you agree, then, for -- for students
23 who were exposed to abuse -- either they were
24 abused themselves or there was abuse going on
25 around them in the home that was undetected -- and

1 students who were neglected in the home, all of
2 that were stressors on students' mental health?

3 MR. BYRD: Object to form.

4 THE WITNESS: Yes.

5 BY MR. KEYES:

6 Q. Do you agree that many students felt
7 isolated during COVID because they couldn't be in
8 close personal contact with people, they couldn't
9 go to school, and they felt isolated as a result?

10 A. Some, yes.

11 Q. And do you agree that for those
12 students, COVID and the consequences of COVID and
13 the isolation was a stressor on their mental
14 health?

15 MR. BYRD: Object to form.

16 THE WITNESS: Yes.

17 BY MR. KEYES:

18 Q. Okay. So do you agree, then, that
19 given the fear of getting sick or dying from COVID,
20 the fear of loved ones getting sick or dying from
21 COVID, the risk of being exposed to abuse that went
22 undetected, the neglect that went on in the home,
23 the inability to be in close contact with people,
24 and the isolation -- for all of those reasons,
25 COVID-19 had a negative effect on students' mental

1 health?

2 MR. BYRD: Object to form.

3 THE WITNESS: But not exclusively those
4 reasons.

5 BY MR. KEYES:

6 Q. Okay. But do you agree that for all of
7 those reasons, COVID-19 had a negative effect on
8 students' mental health?

9 MR. BYRD: Object to form. It's asked
10 and answered.

11 THE WITNESS: That's part of the
12 reason.

13 BY MR. KEYES:

14 Q. Okay. You believe there are other
15 reasons why COVID had a negative effect on
16 students' mental health?

17 A. I do.

18 Q. But what I just listed, those also
19 caused or -- or were reasons why COVID-19 had a
20 negative effect on students' mental health.

21 MR. BYRD: Object to form. Asked and
22 answered.

23 BY MR. KEYES:

24 Q. Is that correct?

25 A. Yes.

1 Q. Okay. Can you go back to Exhibit 2,
2 please. And I just want you to pull out the two
3 worksheets and focus on the program/department
4 worksheet.

5 A. Yeah.

6 Q. Okay. And I want to focus on the two
7 percentage weights that you gave, the 5 percent for
8 psychological services and the 10 percent of school
9 counseling services.

10 A. And I may have weighed in on the pupil
11 personnel. I just don't want to be -- I don't want
12 to misrepresent whether I did or not.

13 Q. Sure. You said you may have spoken
14 with Mr. Williams, but you can't recall?

15 A. Correct.

16 Q. Okay. For the two that you do recall,
17 if -- for the 5 percent of time that staff in the
18 psychological services department spent on issues
19 concerning social media, if they hadn't spent that
20 5 percent of their time on issues concerning social
21 media, what would they have been doing with the
22 freed-up time?

23 A. So that -- that's a great question.

24 The -- the issue we have with both of
25 these groups of staff members is they are forced

1 because of their caseloads and because of the drain
2 of these percentages to be reactive.

3 And they all -- "they all." Most of
4 the staff members in these two groups would love to
5 spend a lot more of their time being proactive and
6 trying to heed off the issues that lead to crisis
7 that they then have to deal with.

8 So if these percentages were taken away
9 and this social media issue was no longer present,
10 they would be able to be a lot more proactive in
11 working with students to reduce the issues that
12 then cause the crisis response.

13 Q. Does that mean that they would get to
14 see other students or more students?

15 A. In some cases, depending on the size of
16 their caseload.

17 But it really would mean that they
18 would be able to work with students on developing
19 skills that they can't spend on time with them now
20 that that skill deficit leads to behavioral,
21 academic, social and emotional issues.

22 Q. So for the psychological services staff
23 and the school counseling services staff, if they
24 didn't spend the 5 percent or the 10 percent that
25 you estimate they spent on issues concerning social

1 media, they could have spent that freed-up time
2 either seeing more students, seeing existing
3 students for more time, and they could have worked
4 with those students on developing skills; is that
5 correct?

6 MR. BYRD: Object to form.

7 THE WITNESS: Yeah. I -- I think --
8 and even if that isn't 100 percent accurate, what
9 they're working with students on is probably the
10 more apt issue on the table in working with
11 students on college planning or career exploration
12 rather than, "Why did you feel like you wanted to
13 kill yourself?" or, "Why did you get in that fight
14 yesterday?" or, "What's going on with you failing
15 your classes?" or, "Why aren't you coming to
16 school?"

17 So those are the -- a lot of the
18 reactive issues that they have to work on with,
19 based on this percentage, stemming from social
20 media.

21 Like, for instance, if we look at
22 attendance and a lot of students not coming to
23 school because they're not getting the proper sleep
24 because they're up all night on their phones.

25 Or they've been bullied on social

1 media. Or they, you know, put something on there
2 that now they're embarrassed about and they don't
3 want to come in.

4 So these are the things that prompt
5 them to have to work on things.

6 They would much rather sit with a
7 student on the positive. But, instead, they're
8 sitting there working with trying to recover from
9 the things that they've done that they shouldn't
10 have done.

11 And I think the -- you know, the
12 community, in essence, is paying the salaries of
13 these people who now have to work on addressing the
14 societal issues that have been thrust upon them.

15 And that's just -- it's an
16 unfortunate -- it's not why a lot of these people
17 got into these roles.

18 BY MR. KEYES:

19 Q. Are you able to identify for me the
20 number of students who are not getting proper
21 sleep?

22 A. I would have to consult the wellness
23 needs assessment data on that. We had students
24 respond to questions about the sleep they get.

25 And I don't believe it's in the

1 wellness needs assessment you have in front of you.
2 I think that was this year's iteration that asked
3 them about their sleep, why they're not going to
4 sleep, if they have a bedtime, how much sleep they
5 get, if they're up on their phones and that is a
6 barrier to sleep.

7 So we have the data. I just don't have
8 it at recall.

9 Q. And when you say it's "this year's
10 iteration," are you talking about for the 2024-2025
11 school year?

12 A. Correct. I don't believe -- I could be
13 wrong. I don't believe we asked that in last
14 year's survey.

15 Q. And has the 2024-2025 wellness needs
16 assessment survey results been put into a final
17 report?

18 A. Not a final report.

19 Q. Has it been put into a draft report?

20 A. Not in report form. But certain people
21 such as myself can go in and pull the data, but not
22 in an officially -- see, the report you have has
23 been made clear to the public whereas, depending on
24 permissions, we can go in and look by school and by
25 grade.

1 Q. Is -- is there any schedule for
2 converting the 2024-2025 wellness needs assessment
3 survey results into a final report?

4 A. I'm sure there is, yes.

5 Q. What is the schedule?

6 A. I don't know. That's something that
7 Mr. Yakoubou works on, so...

8 Q. Okay.

9 A. In fact, maybe it's published and I'm
10 not even aware of it.

11 Q. But you're not aware of a final report
12 and you're not aware of a draft report at this
13 point?

14 A. Correct.

15 Q. And are you able to identify for me the
16 number of students who are not coming to school
17 because they're not getting proper sleep?

18 MR. BYRD: Object to form.

19 THE WITNESS: I don't have a report on
20 that, no.

21 BY MR. KEYES:

22 Q. Do you have any --

23 A. That's -- that's anecdotal.

24 Q. Do you have any quantitative data that
25 you can point to?

1 A. Anecdotal.

2 Q. And are you able to identify for me the
3 number of students who are not getting proper sleep
4 because they're on their phones all night?

5 A. I don't know about all night, but based
6 on self-reporting of students who didn't go to
7 sleep at the time they normally would because of
8 their phone, yes.

9 Q. Where is that data?

10 A. In the wellness needs assessment.

11 Q. For this current year?

12 A. Correct.

13 Q. The one that hasn't been put in a draft
14 or final report yet?

15 A. Correct.

16 Q. And are you able to identify for me
17 what the students are doing on their phones when
18 they aren't getting proper sleep because of their
19 phone?

20 A. So, again, from -- because you're
21 asking me personally, it would be anecdotal of what
22 they're doing.

23 Q. Is that addressed in the data that was
24 collected in the 2024-2025 wellness needs
25 assessment?

1 MR. BYRD: Object to form.

2 You can answer.

3 THE WITNESS: I don't remember. I'm
4 not sure if -- if we just asked them is their phone
5 the issue or what they're doing on their phone. I
6 feel like we may have asked them what they're doing
7 on their phone, but I'd need to look at it.

8 BY MR. KEYES:

9 Q. Are you able to point me to any
10 instance where you made a request that Harford
11 County Public Schools hire more psychologists and
12 attributed that need to students' use of social
13 media?

14 MR. BYRD: Object to form.

15 THE WITNESS: So every year except this
16 year I've made that request. Whether I've
17 indicated the need is due to social media, I don't
18 remember.

19 BY MR. KEYES:

20 Q. Okay. So you said every year you made
21 a request for more psychologists, yes?

22 A. Except for this year.

23 Q. Except for this year.

24 And -- but you don't know whether in
25 making that request for more psychologists you've

1 ever attributed that need to students' use of
2 social media in your funding request?

3 MR. BYRD: Object to form.

4 BY MR. KEYES:

5 Q. Is that fair?

6 A. I don't know. Yes --

7 Q. Okay.

8 A. -- that is correct.

9 Q. Are you able to point me to any
10 instance where you made a request that Harford
11 County Public Schools hire more counselors where
12 you attributed that need to students' use of social
13 media? Same answer?

14 A. Same answer.

15 Q. Are you able to point me to any
16 instance where you made a request that Harford
17 County Public Schools hire more social workers
18 where you attributed that need to students' use of
19 social media in your funding request?

20 MR. BYRD: Object to form.

21 BY MR. KEYES:

22 Q. Same answer?

23 A. Same answer.

24 Q. Would the same be true for PPWs?

25 A. Correct.

1 Q. Would the same be true for behavior
2 coaches?

3 MR. BYRD: Object to form.

4 THE WITNESS: Not -- not the same.

5 BY MR. KEYES:

6 Q. Why not?

7 A. Because they came into existence
8 through funding sources where principals were
9 choosing to have that position. It wasn't my
10 request as a system. It was more principals
11 requesting to use funding they were provided for
12 those positions.

13 Q. So let's --

14 A. It's actually probably true for social
15 workers, too.

16 Q. Okay. So let's make sure we're clear.
17 For social workers and behavior coaches, that
18 wasn't a request that you made?

19 A. Correct.

20 Q. That's a request that principals may
21 have made for how to spend a certain pot of money?

22 A. Correct.

23 Q. And are you aware of any principals
24 requesting funding for more social workers or for
25 more behavior coaches where they attributed that

1 need to students' use of social media in their
2 funding request?

3 MR. BYRD: Object to form.

4 THE WITNESS: I can't say either way.

5 BY MR. KEYES:

6 Q. Okay. You know they made a request --

7 A. Yeah.

8 Q. -- for the position?

9 A. I don't remember the conversations of
10 why.

11 Q. You don't remember anyone saying, "I
12 need these positions because of the way students
13 are using social media."

14 A. No.

15 Q. Fair?

16 A. Correct. Yes.

17 Q. When were the two licensed clinical
18 professional counselor positions created?

19 A. So the second one started last year.
20 And the first one has probably been about three or
21 four years.

22 Q. And are these positions where you
23 requested funding to create the position?

24 A. No. These were similar to those last
25 two. Funding was provided. Principals had

1 discretion on what they needed. This came into
2 existence.

3 Q. Okay. So are you able to point me to
4 any instance where principals requested the
5 creation of a licensed clinical professional
6 counselor position where they attributed that need
7 to students' use of social media?

8 A. Not directly, no.

9 Q. And are you able to point me to any
10 instance where you made a request that Harford
11 County Public Schools hire more nurses where you
12 attributed the need for more nurses to students'
13 use of social media in your funding request?

14 MR. BYRD: Object to form.

15 THE WITNESS: No.

16 BY MR. KEYES:

17 Q. Are you able to identify for me any
18 funding request you made for a new position where
19 you attributed the need for that position to
20 students' use of social media in your funding
21 request?

22 MR. BYRD: Object to form.

23 THE WITNESS: I guess it depends if
24 you're asking directly or not directly because the
25 need is based on behaviors and mental health

1 concerns, which in some part is related to social
2 media.

3 But my exact words weren't, "We need
4 this because of social media." We need it because
5 of the behavior and mental health, the suicide
6 ideation reports, the depression, anxiety that's on
7 the rise, knowing, in my professional opinion, that
8 that, in part, is due to social media use.

9 So it's a -- it's an indirect yes, but
10 not a verbatim literal that's what I asked for and
11 why.

12 BY MR. KEYES:

13 Q. Now, separate from professionals who
14 are employed by Harford County Public Schools, you
15 also engage third-party vendors to provide
16 counseling and treatment services?

17 A. Correct.

18 Q. Who are the vendors that Harford County
19 Public Schools currently uses?

20 A. I don't know the names -- all the names
21 off the top of my head.

22 Q. Well, how many are there?

23 A. Probably 5 to 8 providers covering all
24 55 schools.

25 Q. And how many were there in 2016-2017

1 school year?

2 A. I think we probably had 2 to 3 covering
3 16 schools when I first got here.

4 Q. And so these are third-party
5 professionals, either individuals or organizations,
6 that will provide counselors to provide counseling
7 or treatment services to students in the school --

8 A. Correct.

9 Q. -- during the school day?

10 A. Correct.

11 Q. And where would someone find a list of
12 the vendors that provided these services in any
13 particular year since 2016-2017 school year?

14 A. We have a mental health specialist, and
15 she manages all those contracts. So she would -- I
16 don't know if she has a year-by-year summary of who
17 was in what buildings, but she would know the
18 history of it.

19 Q. What's her name?

20 A. Christina Alton.

21 Q. Does she do other things besides that,
22 or is that the --

23 A. For the first --

24 Q. -- extent of her work?

25 A. Oh, yeah. So from 2019 until last

1 year, that was not -- not that duty, but the title
2 of mental health specialist was her entire role.

3 But because of the exponential growth
4 of the social workers, she's also now the
5 supervisor of the social workers in addition to the
6 mental health specialists.

7 And in 2018, Maryland mandated that
8 every school system -- because of the mental health
9 concerns that were being manifested in the school
10 buildings, they mandated that every school system
11 has a mental health specialist and provided state
12 funding to every school system to pay for that
13 position in part, which is why she came to be.

14 (HENNIGAN EXHIBIT 4, Emails dated
15 4/21/21, Subject: MSDE Report, Bates
16 HCPS_00199774-777, was marked for identification.)
17 BY MR. KEYES:

18 Q. I'm showing you what has been marked as
19 Hennigan Exhibit 4. This was produced with the
20 Bates Numbers HCPS_00199774 through 199777. It's a
21 series of emails between you and Stephen Richards,
22 the supervisor of psychological services. Tell me
23 when you've read this exchange.

24 A. All of it?

25 Q. Sure.

1 A. Because there's --

2 Q. I think there are only --

3 A. There's others on the original email.

4 Q. Yeah. You can read as much of it as
5 you want. I'm going to ask you about your email at
6 the bottom of the first page.

7 A. Oh, this is COVID-related?

8 Q. This is what?

9 A. The first part is COVID-related?

10 Q. Yes.

11 A. Okay.

12 Q. Okay. Would you focus on your email on
13 the bottom, the first page of Exhibit 4. It's an
14 email from you to Steve Richards on April 21st,
15 2021. Do you see that?

16 A. Yes.

17 Q. And you said a moment ago this exchange
18 is "COVID-related." What makes you say that?

19 A. Well, what I meant was the first email
20 because MSDE was asking us how many students we
21 haven't had contact with.

22 But, as I read on, the whole thing
23 seems to be related to students returning to school
24 following the shutdown.

25 Q. Okay. And in your email to

1 Mr. Richards, you say: My guess is the academic
2 frustration will lead to mental health issues in
3 the fall, unfortunately. The first time they are
4 given homework after a year and a half may have to
5 be approached carefully by teachers.

6 Do you see that?

7 A. Yeah.

8 Q. So are you looking at a scenario where
9 virtual learning is ending and in-person schooling
10 is resuming?

11 A. April of '21? We had -- well, in the
12 fall of -- in the fall of '20, we had some students
13 in. And then from the fall of '20 through May of
14 '21, students were brought back incrementally based
15 on grade level.

16 Q. And you said: My guess is the academic
17 frustration will lead to mental health issues in
18 the fall.

19 Are you referring to frustration from
20 students who have fallen behind academically during
21 the shutdown of in-person learning for whatever
22 reason?

23 MR. BYRD: Object. Object to form.

24 THE WITNESS: Yes. But we're only
25 talking about a small portion of our population.

1 BY MR. KEYES:

2 Q. And can you tell me what your guess was
3 about academic frustration leading to mental health
4 issues?

5 A. Well, again, let me just direct you to
6 Steve Richards' email because the -- the group may
7 not understand what he meant by "the bulk of SE
8 concern." He meant special education, which is
9 only 15 percent of our student body. So this email
10 is just about the 15 percent of our students who
11 have IEPs.

12 Q. Okay.

13 A. So my concern was those students who
14 have IEPs, they'll be more frustrated academically,
15 which may -- some of them also have mental health
16 diagnoses as well, which would be exacerbated by
17 the academic deficits they have and coming back and
18 being forced to do some things they hadn't done in
19 a while.

20 Q. Well, what is the academic frustration
21 you're talking about?

22 MR. BYRD: Object to form.

23 Go ahead.

24 THE WITNESS: The academic frustration
25 would be more rigor than they'd had in the last few

1 months.

2 BY MR. KEYES:

3 Q. And then feeling stressed about not
4 being able to keep up or having to work harder to
5 keep up?

6 A. Well, again, we're talking about a very
7 small part of our population who struggle to keep
8 up regularly. So, yeah. Even pre-COVID.

9 Q. You said in April of 2021 that this was
10 your guess. Did your guess prove to be right?

11 A. I don't know. I don't know that our
12 special education students presented mental health
13 concerns more so than the rest of the population.
14 I can't say that clearly.

15 Q. You have not studied that issue?

16 A. No.

17 (HENNIGAN EXHIBIT 5, Document titled
18 Mental Health Statistics and Initiatives in HCPS,
19 was marked for identification.)

20 BY MR. KEYES:

21 Q. I'm showing you what has been marked as
22 Hennigan Exhibit 6.

23 MR. BYRD: 5.

24 MR. KEYES: I'm sorry. Strike that.

25 BY MR. KEYES:

1 Q. I'm showing you what has been marked as
2 Hennigan Exhibit 5.

3 THE WITNESS: Thank you.

4 BY MR. KEYES:

5 Q. Sure.

6 This was produced with the Bates Number
7 HCPS_00039108 in native format.

8 What -- what is Hennigan Exhibit 5?

9 A. So this appears to be a presentation
10 that my team and I delivered to the Board of
11 Education.

12 Q. And do you know when you delivered this
13 presentation?

14 A. So based on my title, it would have
15 been somewhere between January of '17 and June of
16 '19.

17 My guess is probably in 2018. I don't
18 think I would have taken this on in my first year.
19 '18 or '19. '18 or the first half of '19.

20 Q. These pages don't seem to be numbered,
21 but could you go to the page that has Mental Health
22 Initiatives? It's got your -- Buzz Williams' name
23 and "Superintendent's Designee"?

24 A. Uh-huh. Yes.

25 Q. Do you see the page that -- that says:

1 Reduced Suspensions For Counseling?

2 A. Yes.

3 Q. And then it lists: Drugs, Alcohol,
4 Tobacco, Conflict resolution, Fire setting and
5 Bullying?

6 A. Yeah.

7 Q. What was this telling the board about
8 reduced suspensions for counseling on these issues?

9 A. So Mr. Williams became pretty adept at
10 finding ways to try to help children learn from
11 their mistakes rather than punishing them for their
12 mistakes.

13 So, for instance, students caught
14 smoking or vaping may have to complete a class,
15 which would reduce their suspensions.

16 Students caught pulling the fire alarm
17 might have to meet with the fire chief. Students
18 caught in possession of or use of drugs or alcohol
19 may end up going through a class.

20 So all things that may help -- one,
21 help them to learn from their mistakes; and, two,
22 reduce their suspension.

23 Q. Would you turn a few pages later, and
24 you'll see a slide that says: Mental Health
25 Initiatives School Psychologists/Pupil Personnel

1 Workers, and it lists Steve Richards?

2 A. Yes.

3 Q. Okay. Does that indicate that the next
4 few slides were presented by Mr. Richards?

5 A. Yes. At that time, Mr. Richards also
6 oversaw the pupil personnel workers that
7 Mr. Williams currently now oversees.

8 Q. And is this a slide presentation where
9 you would have reviewed it in advance of it being
10 presented to the Board of Education?

11 A. Yes.

12 Q. The very first slide in the deck
13 associated with Mr. Richards is a list of suicide
14 risk factors.

15 Do you see that?

16 A. Yes.

17 Q. Do you think that is an accurate list
18 of suicide risk factors?

19 A. I believe at the time it was.

20 Q. Okay. There's no mention of social
21 media use here, correct?

22 A. Correct. It's sort of embedded
23 throughout.

24 Q. How so?

25 A. Well, we know that social media is

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1 directly tied to increase in depression. So you
2 have depression, but you don't have the factor
3 which created it listed.

4 The same thing with suicide attempts.
5 The same thing with substance abuse. Family
6 histories of depression. Poor adaptability.

7 So all those things have been adversely
8 impacted by social media as -- but this is sort of
9 the end result of what was caused.

10 Q. And what is your basis for saying
11 social media is directly tied to an increase in
12 depression? What are you relying on?

13 MR. BYRD: Object to form. Asked and
14 answered.

15 But go ahead.

16 THE WITNESS: Research that I've read.

17 BY MR. KEYES:

18 Q. What research can you point me to?

19 A. So starting with something we've
20 already discussed, which is "The Anxious
21 Generation."

22 Q. Mr. Haidt's book?

23 A. Yeah.

24 Q. Okay. Anything else?

25 A. Other reports that I can't cite by name

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1 but just, in my position -- in my position, I end
2 up reading a lot of information about mental health
3 concerns and causation in addition to my work with
4 our partners in the health department.

5 And so I can't speak to any specific
6 article or research, but I anecdotally can report
7 that I've read a lot about it and heard a lot about
8 it.

9 Q. And -- and Mr. Haidt's book and this
10 other reports that you can't cite by name talk
11 about how the content that a student can -- can
12 read or comments about the student that are posted
13 on social media can tie to depression and these
14 other adverse consequences you list?

15 MR. BYRD: Object to form.

16 You can answer.

17 THE WITNESS: It's not just the
18 content. It's the format. It's the way it's
19 delivered. It's the addictive nature of it. It's
20 all those things. So it's not just the content.

21 BY MR. KEYES:

22 Q. But the content is part of it?

23 A. Part of it.

24 Q. And would you say a minor part?

25 MR. BYRD: Object to form.

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1 THE WITNESS: I can't -- I can't
2 quantitatively answer that.

3 BY MR. KEYES:

4 Q. You can't speak to what -- --

5 A. What percentage content plays.

6 Q. -- percentage of the -- of the causal
7 force is attributable to content as opposed to
8 something else?

9 A. No. I don't know that the kids could
10 either.

11 Q. And are you able -- even with a bit of
12 reflection able to identify any of these reports
13 that you mentioned before other than Mr. Haidt's
14 book?

15 A. Not off the top of my head, no.

16 Q. Okay. Either the -- the names of the
17 author or the names of the reports or the names --

18 A. I know your question. I don't know the
19 answer.

20 Q. Okay.

21 MR. KEYES: Off the record.

22 Let's take a break.

23 THE VIDEOGRAPHER: We are off the
24 record at 1649.

25 * * *

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1 (Whereupon, there was a recess in the
2 proceedings from 4:49 p.m. to 5:08 p.m.)

3 * * *

4 THE VIDEOGRAPHER: We are on the record
5 at 1708.

6 BY MR. KEYES:

7 Q. Mr. Hennigan, when you treated clients
8 at the Human Development Center, were any of your
9 clients students of Harford County Public Schools?

10 A. Yes.

11 Q. How many?

12 A. I'll have to ballpark that. Ten.

13 Q. And did you treat any of those ten for
14 social media addiction?

15 A. No.

16 Q. Did you treat any of them for addiction
17 issues in general?

18 A. No.

19 Q. When you saw patients or clients at
20 Guided Wellness Counseling, were any of your
21 clients students of Harford County Public Schools?

22 A. No. Part of my -- that transition was
23 I wasn't going to see students anymore because of
24 my role here. So I stopped seeing any Harford
25 County Public School students. I only saw either

1 private school or adults.

2 Q. And did you treat any of the clients
3 you did see at Guided Wellness Counseling for
4 social media addiction?

5 A. No.

6 Q. Did you treat any of those clients for
7 addiction issues in general?

8 A. Yes.

9 Q. What types of addictions did you treat
10 them for?

11 A. Opioid use. I think that's probably
12 the only clinical addiction that I dealt with as
13 far as people that I saw.

14 Q. And what training do you have in
15 treatment of patients for addiction?

16 A. I don't have specific training in that.

17 Q. But do you -- do you have any training
18 in the treatment of patients for addiction?

19 A. Just in my regular clinical training,
20 not specifically with an addiction.

21 Q. What do you mean just in your regular
22 clinical training?

23 A. So when you get trained to be a
24 clinician, you get trained in a myriad of areas,
25 but you don't necessarily become an addictions

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1 counselor, a family marriage counselor, unless you
2 do additional training and then market yourself as
3 such.

4 Q. Have you ever marketed yourself as
5 being a counselor who provides addiction treatment?

6 A. No.

7 Q. Have you ever published any articles on
8 addiction treatment?

9 A. No.

10 Q. Have you ever lectured on addiction
11 treatment?

12 A. No.

13 Q. Have you ever researched addiction
14 treatment?

15 MR. BYRD: Object to form.

16 THE WITNESS: Probably.

17 BY MR. KEYES:

18 Q. What research did you do in the area of
19 addiction treatment?

20 A. I don't know. I'm just thinking, over
21 these past 15 years, I'm sure I've -- many times
22 when I'm working with patients that have issues
23 that I maybe don't have expertise -- direct
24 expertise on, I'll do research.

25 So I imagine that I've come across

1 research on that. But I can't remember a specific
2 instance or specific research.

3 Q. Have you diagnosed any Harford County
4 Public Schools' student with social media
5 addiction?

6 A. That's not my role; so, no.

7 Q. So you've never done it?

8 A. No.

9 Q. Have you diagnosed any Harford County
10 Public School student with any addiction?

11 A. Not my role.

12 Q. So you haven't done it?

13 A. No.

14 Q. Have you done any clinical research
15 into addiction?

16 A. I think you already asked me that.
17 Yeah, I -- I think I have.

18 Q. Okay. What is the clinical research
19 you've done regarding addiction?

20 A. To restate what I said a minute ago, I
21 don't know that I have or what I have. I just
22 would assume that probably over the years I have
23 had some -- come across some research on addiction.

24 Q. By Googling it or something else?

25 A. Or in -- yeah, I don't know if it's

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1 through Googling or not. I'm not sure. I'm
2 just -- I'm sure I've come across research on
3 addiction in my years of working in this field.
4 How I came across it, I don't know, but it seems
5 like a logical conclusion that I would have.

6 Q. Okay. I was asking about clinical
7 research. You're saying you -- you may have come
8 across research on addiction that you read,
9 correct?

10 A. Uh-huh.

11 Q. Is that -- is that a "yes"?

12 A. Yes.

13 Q. But you're not able to identify any of
14 the research that you may have come across,
15 correct?

16 A. Correct. Correct.

17 Q. Have you done any clinical research
18 into addiction, that is, working with patients who
19 participate in any kind of clinical study?

20 A. Oh, no.

21 Q. Has any Harford County Public student
22 come to you to say they were diagnosed with social
23 media addiction?

24 A. No. I don't -- no.

25 Q. Has any Harford County Public School

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1 student come to you to say they think they have
2 social media addiction?

3 A. Would you define pornography as social
4 media?

5 Q. No.

6 A. Clinical diagnosed addiction or their
7 own -- in their own verbiage?

8 Q. Well, I already asked, has any Harford
9 County Public School student come to you to say
10 they were diagnosed with social media addiction.

11 A. Uh-huh.

12 Q. You said no.

13 So now I'm asking, has any Harford
14 County Public School student come to you to say,
15 "I think I have social media addiction"?

16 A. Potentially.

17 MR. BYRD: Object to form.

18 BY MR. KEYES:

19 Q. Potentially.

20 Can you -- can you identify any for a
21 specific instance where that happened?

22 A. So --

23 MR. BYRD: And -- and, obviously,
24 objection. And as far as revealing some student's
25 name, we're not going to do that. But if there's

1 an instance that's specific, he can talk about it
2 generically.

3 THE WITNESS: So since this portion is
4 to do with my personal life, I've had a lot of
5 discussions with my children and their friends, and
6 they've had a lot of discussion about having issues
7 with getting off social media.

8 So whether they've used the word
9 "addiction" or not, I can't say. But I've had
10 conversations with Harford County Public School
11 students who have discussed their concern with
12 their inability to stop accessing social media.

13 BY MR. KEYES:

14 Q. And are these Harford County Public
15 School students, you're identifying your children
16 and their friends?

17 A. My children's friends, not my children.

18 Q. Okay. So you've had discussions with
19 your children's friends where they say they have
20 issues with getting off social media?

21 A. Yes.

22 Q. But you don't know whether they've ever
23 used the word "addiction" or not?

24 A. Correct.

25 Q. Have you had discussions with any

1 Harford County Public students, other than your
2 children's friends, where those students have said,
3 "I think I have social media addiction"?

4 A. Not that I recall.

5 Q. And have you had any discussions with
6 any Harford County Public School students, other
7 than your children's friends, where they've said
8 they have issues with getting off social media?

9 A. Possibly.

10 Q. Can you recall any specific instance?

11 A. No. But I spend a lot of time hearing
12 students, being in classrooms, being in buildings,
13 and that possibly could have been a discussion.

14 Q. So you'd say it's possible. You just
15 don't remember any specific instance?

16 A. Correct.

17 Q. Have you discussed with any teachers
18 the percentage of time they spend on issues related
19 to social media in the classroom?

20 A. Yes.

21 Q. What teachers?

22 A. By name?

23 Q. Yes.

24 A. I'm thinking of faces. Ms. Ackley,
25 Kelly Ackley.

1 Q. Anyone else?

2 A. Ms. Jester.

3 Q. Anyone else?

4 MR. BYRD: Give him a second here.

5 He's said he's thinking.

6 THE WITNESS: Kelly -- Kelly Jester,
7 same as Kelly Ackley. I can't think of other
8 people's names --

9 BY MR. KEYES:

10 Q. Okay.

11 A. -- at the moment.

12 Q. Have you given me two names?

13 A. I have.

14 Q. Kelly Ackley and Ms. Jester?

15 A. Kelly Jester, yeah.

16 Q. Kelly Ackley and Kelly Jester?

17 A. Correct.

18 Q. Okay. And where does Kelly Ackley
19 teach?

20 A. South Hampton Middle School.

21 Q. What grade or grades?

22 A. She's a special educator.

23 Q. And where does Kelly Jester work?

24 A. Bel Air Middle School.

25 Q. What grade or grades does she teach?

1 A. Either 7th or 8th. There's also a
2 Ms. Forbes, F-O-R-B-E-S. I don't know her first
3 name.

4 Q. Where does she teach?

5 A. Bel Air Middle School.

6 Q. What grade or grades?

7 A. At the time -- well, sorry. She's
8 Bel Air High School now. At the time that we
9 talked about this, she was at Bel Air Middle
10 School. And we had some lengthy discussion about
11 it as I was there for a group response following a
12 suicide of one of their children.

13 Q. What grade or grades did she teach?

14 A. 8th grade at the time.

15 Q. Okay. Anyone else?

16 A. Mindy Durante, D-U-R-A-N-T-E. She is
17 an art teacher at Edgewood High School.

18 Q. Anyone else?

19 A. Not that I can think of.

20 Q. Okay. What did Ms. Ackley say about
21 the percentage of time she spent on issues related
22 to social media?

23 A. She didn't give me a percentage.

24 Q. What -- what did she say in terms of
25 characterizing it?

1 A. We just spoke about the policy that was
2 coming out this year and her being excited about it
3 because of the issues they have trying to get kids
4 to put their phones away and the issues they're
5 having with inattention due to students preferring
6 to be on social media apps rather than attend to
7 the teacher.

8 Q. So she was pleased that the Board of
9 Education was adopting the current policy?

10 A. Correct.

11 Q. Have you talked to her since the policy
12 was adopted about the percentage of time she spends
13 on issues related to social media?

14 A. No.

15 Q. What did Ms. Jester say about the
16 percentage of time she spent on issues related to
17 social media?

18 A. She did not indicate percentages.

19 Q. What did she say in terms of
20 characterizing it?

21 A. Similar to Ms. Ackley in that it was a
22 struggle to keep the attention of the students in
23 part because of wanting to access their phones
24 during the day and in part because of their
25 rewiring of their brain due to social media outside

1 of the school day.

2 Q. Anything else?

3 A. Nothing that I can recall.

4 Q. What did Ms. Forbes say about the
5 percentage of time she spent on issues related to
6 social media?

7 A. Did not indicate a percentage.

8 Q. What did she say about the time she
9 spent on issues related to social media in terms of
10 quantity of time?

11 A. Quantity of time, she didn't indicate
12 the quantity of time.

13 Q. What did Ms. Durante say about the
14 percentage of time she spent on issues related to
15 social media?

16 A. She didn't indicate a quantity of time
17 or a percentage.

18 Q. Okay. So have you spoken with any
19 teacher in Harford County Public Schools who has
20 described for you the quantity of time they spent
21 on issues related to social media?

22 MR. BYRD: Object to form.

23 THE WITNESS: Possibly, but not that I
24 can recall clearly enough to state.

25 BY MR. KEYES:

1 Q. Okay. Have you spoken with any
2 administrator in Harford County Public Schools who
3 has described for you the quantity of time they
4 spend on issues related to social media?

5 MR. BYRD: Object to form. Asked and
6 answered on whatever exhibit number we are in now.

7 THE WITNESS: It is a conversation that
8 I have with administrators, but I don't have
9 detailed information about quantity of time.

10 BY MR. KEYES:

11 Q. Are you able to identify for me any
12 administrator in Harford County Public Schools who
13 describe for you the quantity of time they spend on
14 issues related to social media?

15 A. No.

16 MR. BYRD: Object to form.

17 BY MR. KEYES:

18 Q. Are you able to identify for me any
19 quantitative data that shows how many Harford
20 County Public School students are -- have social
21 media addiction?

22 MR. BYRD: Object to form.

23 THE WITNESS: No, because I'm not privy
24 to their clinical diagnoses.

25 BY MR. KEYES:

1 Q. Are you able to identify for me any
2 quantitative data that shows how many Harford
3 County Public School students are addicted to the
4 use of cell phones?

5 A. No, because I don't have access to that
6 data.

7 Q. Are you able to identify for me any
8 quantitative data that shows how many Harford
9 County Public School students are addicted to cell
10 phones or social media because of the defendants'
11 platforms?

12 A. No.

13 MR. KEYES: Okay. I have no questions
14 at this time.

15 Does anyone else on the Zoom have
16 questions for Mr. Hennigan?

17 MR. FLASTER: No questions from Meta.

18 MR. BYRD: Okay. Just a couple
19 follow-ups here.

20 * * *

21 EXAMINATION

22 BY MR. BYRD:

23 Q. You were asked about this PowerPoint
24 here, this State of Maryland YRBS PowerPoint. I
25 think it's Exhibit Number --

1 A. 3.

2 Q. -- 3. Do you recall those questions?

3 A. I believe so, yes.

4 Q. If you can turn to Page 7 of the
5 PowerPoint. It's titled -- it says: Overall
6 trends from the most recent YRBS/YTS.

7 Do you see that?

8 A. Yes.

9 Q. And it looks like the trend is up. The
10 trend is up for mental health indicators, which
11 are: sad or -- well, can you read what those are?

12 A. Sad or hopeless, suicide ideation,
13 suicide attempt.

14 Q. And the trends, according to this
15 document, say that those are going up, right?

16 A. Yes.

17 Q. Is that consistent with what you were
18 discussing as it relates to social media?

19 MR. KEYES: Objection to form.

20 THE WITNESS: Absolutely. I think
21 the -- a lot of what we talked about today are
22 societal factors that have existed for decades and
23 have not spiked this data and with any comparison
24 to the spike in the data once social media became
25 prevalent and accessible to students.

1 BY MR. BYRD:

2 Q. And Mr. -- the defense counsel asked
3 you -- Mr. Keyes asked you about some of these
4 other things all throughout today and earlier today
5 about tobacco and alcohol and other things.

6 And then what does it say the trend is
7 for that in this document that he -- that he showed
8 you?

9 MR. KEYES: Objection to form.

10 THE WITNESS: So substance
11 indicators -- substance use indicators are on a
12 downward trend.

13 BY MR. BYRD:

14 Q. So for the ACEs, the substance
15 indicators that form some of these ACEs are going
16 down, right?

17 MR. KEYES: Objection to form.

18 THE WITNESS: So the -- yeah. So
19 for -- as far as substances, yes.

20 BY MR. BYRD:

21 Q. While the mental health indicators are
22 going up, right?

23 A. Correct. Yes.

24 Q. And this is in 2021. This -- this
25 is -- this report covered 2021 to '22, right?

1 A. Yes.

2 Q. It talks on that same page about female
3 students more likely to report mental health.

4 Is that consistent with what you've
5 been saying about social media?

6 A. Yes. And -- and if I can expound.

7 These two data points, the mental
8 health indicators going up and substance use going
9 down, are more directly linked than you might
10 think.

11 The alcohol, tobacco, marijuana use is
12 down in part because kids are not going out and
13 leaving their houses and socializing.

14 And, as a result, they're in their
15 homes alone or without socialization, without
16 friends, which is then leading to hopelessness and
17 sadness and suicidal ideation.

18 And in part because, as I said earlier,
19 a lot of our -- and especially females know that
20 they are imperfect. But yet on social media, it
21 appears to them that everybody else is perfect.

22 So when you don't go out of your house
23 to socialize with others the way children have in
24 past years, you're not going to engage in risky
25 behavior because you're not going to smoke a

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1 cigarette in your bedroom the same way you might in
2 a woods somewhere or something. So you're going to
3 see those go down.

4 But yet we've -- now we've got these
5 socially isolated children who are comparing
6 themselves to people based on filters and based on
7 inaccurate portrayals that people are putting of
8 themselves on social media.

9 So then it kind of makes sense why it's
10 happening.

11 Q. So turn to Page 14. You were asked
12 about this emotional abuse map by county.

13 Do you see that?

14 A. Good thing you said that because I
15 thought that was an acronym.

16 Q. Oh. I don't know.

17 A. No, I don't think it is.

18 Q. It is a map.

19 A. I think you're right. It's a map.

20 Q. I don't know if I'm referring to the
21 acronym "MAP," but who knows.

22 A. No, it's a map.

23 Q. But you were asked questions about
24 this, right?

25 A. Yes.

1 Q. Well, now, is -- from your observations
2 and expertise and time in this field with students,
3 is social media leading to emotional abuse?

4 MR. KEYES: Objection to form.
5 Foundation.

6 THE WITNESS: I definitely -- I
7 definitely think there's -- there's some
8 correlation.

9 I -- we have seen, as I said, a
10 generalized deterioration of parenting. And so
11 when parents are themselves addicted to social
12 media, they are annoyed by a child who needs
13 attention --

14 BY MR. BYRD:

15 Q. Can it lead --

16 A. -- which can lead to emotional abuse.

17 Q. So can it -- can it exacerbate
18 emotional abuse that's already occurring?

19 A. I believe so.

20 MR. KEYES: Objection to form.

21 BY MR. BYRD:

22 Q. Huh?

23 A. I believe so.

24 Q. What about household mental illness
25 that you were asked about on 18? Can social media

1 exacerbate or even cause household mental illness
2 problems?

3 MR. KEYES: Objection to form.

4 THE WITNESS: Well, social media has
5 created a new diagnosis of mental illness that
6 didn't exist in prior years. So you now have a new
7 addiction on the streets that wasn't there prior.
8 So, yes.

9 BY MR. BYRD:

10 Q. And if you turn to Page 27, I think
11 we've talked about it.

12 The idea is that you have these ACEs,
13 right?

14 A. Yes.

15 Q. We listed all of them.

16 Are -- are -- are kids that have ACEs
17 or multiple ACEs, are they more vulnerable to
18 social media -- to -- to problems from social media
19 use?

20 MR. KEYES: Objection to form.

21 THE WITNESS: They can be. Because the
22 impact of an ACE is all dependent on the presence
23 or absence of protective factors, the presence or
24 absence of resilience.

25 So a child who is already down and out

1 is going to be more adversely affected by an ACE
2 and by negative inferences that are drawn from
3 social media than a child who, let's say, has a
4 very sound home life, who maybe can write off a
5 fleeting feeling of sadness or depression or -- I
6 won't call it "depression."

7 -- of sadness or inadequacy because
8 they then can look around at the rest of their life
9 and see, Okay, I can deal with that small blip.

10 But other students who have a lot of
11 ACEs can then just see those feelings of inadequacy
12 and sadness and hopelessness as just one more straw
13 in the pile, which is why we have seen an increase
14 in -- in suicides.

15 BY MR. BYRD:

16 Q. If you -- it's Page 27. And so as I
17 understand what you said, you have these ACEs.

18 And to mitigate the -- it says to
19 mitigate the effects of ACEs, communities can focus
20 on these, like -- on positive experiences. And
21 they list these seven things right here, right?

22 A. Uh-huh. Yeah.

23 Q. Just -- just looking at some of these,
24 does social media help or hurt these childhood
25 positive experiences?

1 MR. KEYES: Objection to form. Lack of
2 foundation.

3 THE WITNESS: I think it hurts several
4 of them. I think children are not -- are not
5 engaging in community traditions and volunteerism
6 as much as they were, because they don't want to
7 engage in those things because they're -- would
8 rather sit in their room and stare at videos all
9 day. And, frankly, that was one that surprised me
10 as a parent. I didn't know how important it was to
11 have my children involved in community events and
12 volunteerism.

13 I would also say feeling safe and
14 protected by an adult in your home, a lot of our
15 children have grown up with -- with adults who they
16 don't feel safe around because they're not paying
17 attention to them because they're more interested
18 in what's happening in their phone.

19 Feeling supported by friends, we know
20 by research that children are not socializing and
21 don't have the friendships to the degree they did
22 pre-social media. So that's an absolute impact.

23 Feeling a sense of belonging in high
24 school, again, social media has created more of a
25 feeling of isolation than of belonging.

1 Those are the -- those are the big ones
2 I would say that have been negatively impacted by
3 social media.

4 BY MR. BYRD:

5 Q. You were asked by counsel about COVID
6 several times, and you remember he -- he asked you
7 questions but wanted you to exclude any -- any
8 relationship that COVID had to -- to social media
9 use, right?

10 So I think you started to say that
11 there were other reasons, and he said, "I don't
12 want to hear about the other reasons."

13 Can you tell the jury about, how
14 does -- how is COVID and social media related?

15 MR. KEYES: Objection to form. Totally
16 mischaracterizes the record. If you're going to
17 characterize the record, let's be accurate.

18 MR. BYRD: Yeah, we can read it.

19 Go ahead.

20 THE WITNESS: So part of the -- part of
21 the problem, again, when people use the word
22 "COVID," it's too general because there's a million
23 things associated with COVID; that some of it was
24 positive, to be honest with you.

25 But part of the issue with COVID is

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1 people -- a lot of parents wanted to find a way to
2 connect their children because they weren't able to
3 connect in person. They thought using social media
4 or phones would be a good avenue to do that and
5 then were hoodwinked into believing that that was
6 going to be a positive thing, and then it turned
7 into the crisis we're in today.

8 So I think if not for COVID, the
9 statistics on when children are introduced to
10 phones and social media would probably -- that sort
11 of bell curve probably would be moved because it's
12 now become socially acceptable to do those things
13 at a much younger age.

14 BY MR. BYRD:

15 Q. So social media made the isolation
16 problems from COVID worse, right?

17 MR. KEYES: Objection to form.

18 THE WITNESS: In the long run, I think.
19 In the short term, maybe not. But in the long
20 term, it absolutely created an environment where
21 children felt that they were making friends with
22 people they never met. They were socializing and
23 talking, quote, unquote, to people when they
24 weren't even opening their mouth.

25 And, frankly, it had -- has opened the

1 doors for a lot of sexual predators and child
2 trafficking. The average age of an online gamer is
3 30, and most of our kids probably think it's 12.
4 So a lot of our ten-year-olds are playing games
5 with 50-year-olds who they think are 12.

6 And child sex trafficking has become
7 the Number 2 highest crime in our country. And I
8 think social media has allowed for people to enter
9 the lives of children, who in person those children
10 would have been savvy enough to never let that
11 happen, and parents wouldn't have let them in.

12 But the issue is, all those places and
13 people that my parents wouldn't let me go be and
14 see, my child doesn't have to leave her bedroom to
15 go see them. So they're all right there inside
16 that phone preying on them, where I had to leave my
17 house and go find those things.

18 So the problem with social media that
19 has been exacerbated through COVID is all those
20 demons are right there inside your child's bedroom.
21 BY MR. BYRD:

22 Q. Let me just ask you a couple of quick
23 follow-up things. You were asked about hiring --
24 hiring more professionals to deal with social media
25 and whether you put that on the form or not.

1 Just to confirm, you did hire more
2 professionals because of the social media issues
3 you've been dealing with, correct?

4 MR. KEYES: Objection to form.
5 Mischaracterizes the testimony.

6 THE WITNESS: We hired more individuals
7 because the mental health crisis spiked so sharply
8 in -- in response to increased social media access.

9 BY MR. BYRD:

10 Q. And that's true even though you didn't
11 write it down somewhere in the funding request,
12 right?

13 A. Correct.

14 Q. You were asked about this
15 Interrogatory 5 --

16 A. Yes.

17 Q. -- that I think is Exhibit Number 2.

18 A. Yes.

19 Q. You were asked about two of the
20 categories, and I think you said you may have
21 contributed to the pupil personnel services was
22 one. You couldn't recall. Do you remember those
23 questions?

24 A. I do.

25 Q. Let me just ask you. From what I

1 understand what pupil personnel services do, well,
2 explain what that is, and how could that relate to
3 social media? Even if you gave the weight or
4 didn't give the weight, how can that relate to
5 social media?

6 MR. KEYES: Objection to form.

7 THE WITNESS: So pupil personnel
8 workers do a lot of things, but a large part of
9 their job is managing attendance at the most
10 egregious levels. So working with families when
11 children's attendance has become unresolved by
12 letters and phone calls.

13 So the pupil personnel workers will do
14 a lot of home visits, taking families to court,
15 taking them to truancy court for children who are
16 missing a lot of school.

17 And one of the things that we've seen
18 in my presentation to the Board of Education is we
19 have seen, you know, changes in our attendance.
20 And part of that, anecdotally speaking, we have
21 children not wanting to come to school either
22 because of how they feel about themselves, how
23 they've been made to feel by other people, bullying
24 and harassment that's occurred on social media, all
25 these things.

1 So when you look at a caseload of
2 children not coming to school, every single one of
3 them has a different reason. But a lot of what our
4 pupil personnel workers are seeing is students
5 wanting to be isolated for two reasons.

6 One, they've become uncomfortable being
7 in social situations because social media has
8 stripped that away from them. But they also don't
9 feel as though they can get up and go a lot of
10 times because of the lack of sleep.

11 And I know that in California and
12 Florida, they're looking at changing school times
13 because of -- there's a recognition that school
14 starts too early because kids are not going to
15 sleep on time. And some of that is because parents
16 are allowing them to have their phones in their
17 bedrooms at night. And they can't figure out why
18 their child is so tired and looks depressed when
19 they're not monitoring the fact that their child
20 may have been on the phone until 4:00 in the
21 morning and then getting up at 6:00 for school.

22 So the PPWs are spending a lot of their
23 time trying to address attendance issues that would
24 not be issues if it not for some social media.

25 BY MR. BYRD:

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1 Q. Okay. And finally, at the beginning of
2 this deposition, you were asked about whether you
3 had done anything -- you had done anything to ask
4 the defendants to change their conduct or change
5 their platforms. Do you recall that question?

6 A. I do.

7 Q. And you asked, do you mean me
8 personally; is that right?

9 A. In this part. I believe this morning I
10 was asked if the system had, but, yes, me
11 personally --

12 Q. Yeah. Has the district done anything
13 to ask the social media companies about --

14 A. Absolutely, yeah, in this complaint,
15 because they recognize that they have all the power
16 in changing how -- in how this information is
17 delivered to children and, frankly, the impact that
18 that's having on them, so...

19 MR. BYRD: Okay. That's all I have.

20 * * *

21 EXAMINATION

22 BY MR. KEYES:

23 Q. For Exhibit 2, the program/department
24 worksheet, where it says: Pupil personnel
25 services, 5 percent.

1 A. Uh-huh.

2 Q. Are you there?

3 A. I am.

4 Q. You said you may have spoken with
5 Buzz Williams?

6 A. Yes. I just remember getting this and
7 debating if I was going to look into it and answer
8 it or if he was. I don't remember where that shook
9 out.

10 Q. If Mr. Williams testified that he
11 picked the 5 percent weight for pupil personnel
12 services, would you defer to his testimony on how
13 he arrived at that 5 percent?

14 MR. BYRD: Object to form.

15 THE WITNESS: I'd say in part. The
16 PowerPoint that you noticed earlier had
17 Mr. Richards as the supervisor of pupil personnel
18 services, so it's -- you know, he understands the
19 job and works with those -- with that staff and has
20 for years but doesn't have the historical knowledge
21 that I have having been a pupil personnel worker
22 for 12 years of my career.

23 BY MR. KEYES:

24 Q. Well, but if Mr. Williams testified
25 that he picked the 5 percent weight for pupil

1 personnel services --

2 A. Uh-huh.

3 Q. -- without consulting you --

4 A. Uh-huh.

5 Q. -- would you defer to his testimony on
6 how he arrived at the 5 percent weight?

7 MR. BYRD: Objection. And speculation
8 and vague. And he doesn't know about what the
9 testimony was to be able to tell you whether he --

10 MR. KEYES: Well, it's a --

11 MR. BYRD: -- defers to it or not.

12 MR. KEYES: Well, it's a speaking
13 objection.

14 BY MR. KEYES:

15 Q. But if someone else said, "I picked the
16 5 percent," and you don't have any recollection of
17 picking the 5 percent, would you defer to his
18 testimony on how he picked the 5 percent?

19 MR. BYRD: Object to form.

20 THE WITNESS: I suppose I would have
21 to.

22 BY MR. KEYES:

23 Q. You testified earlier that without
24 COVID, families, parents and students would not
25 have allowed students access to phones or social

1 media as early as they did. Did I get that right?

2 A. I said I don't think they would have.

3 I think the --

4 Q. Do you -- do you have any -- any --

5 A. -- the trajectory would be different.

6 Q. Do you have any data or research --

7 A. No.

8 Q. -- to support that opinion?

9 A. No.

10 Q. That's your impression?

11 A. Yeah.

12 MR. KEYES: Okay. I have no further
13 questions. Thank you, Mr. Hennigan.

14 MR. BYRD: Okay. We're done.

15 MR. KEYES: Does anyone else?

16 MR. FLASTER: None from Meta.

17 MR. KEYES: Anyone else on Zoom have
18 any questions for Mr. Hennigan?

19 MR. KEYES: Okay.

20 MR. BYRD: I think we're done. I will
21 say, for the court reporter, that I believe our
22 side has looked at your redact- -- they've proposed
23 redactions and are going to send it. And you all
24 please chime in or do whatever. And that's that
25 we -- we either have sent it or are soon sending it

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1 to you, to the court reporter.

2 THE VIDEOGRAPHER: Stand by. We are
3 off the record at 1743.

4 MR. KEYES: Can you offer our times?

5 THE VIDEOGRAPHER: Yes. Mr. Keyes is
6 at 2 hours and 22 minutes. And Mr. Byrd is at
7 16 minutes.

8 (WHEREUPON, the deposition was
9 concluded at 5:44 p.m.)

10 (Signature Reserved.)

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DEPOSITION ERRATA SHEET

Case Caption: In Re: Social Media Adolescent
Addition/Personal Injury Liability Litigation

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that
I have read the entire transcript of my deposition
taken in the captioned matter or the same has been
read to me, and the same is true and accurate, save
and except for changes and/or corrections, if any,
as indicated by me on the DEPOSITION ERRATA SHEET
hereof, with the understanding that I offer these
changes as if still under oath.

Signed on the _____ day of
_____, 20____.

BERNARD HENNIGAN

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DEPOSITION ERRATA SHEET

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CERTIFICATE OF REPORTER

I, Cindy A. Hayden, Registered Merit Reporter and Notary Public for the State of Maryland, do hereby certify:

That the foregoing deposition was taken before me on the date and at the time and location stated on Page 1 of this transcript; that the deponent was duly sworn to testify to the truth, the whole truth and nothing but the truth; that the testimony of the deponent and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed; that the foregoing deposition as typed is a true, accurate and complete record of the testimony of the deponent and of all objections made at the time of the examination to the best of my ability.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof. Witness my hand, this 8th of May, 2025.



Cindy A. Hayden,
Registered Merit Reporter
Notary Public
State of Maryland
My Commission expires:
April 26, 2029

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